

MUR 4877

Certification

Jan 20 2 13 PM '99

William and Patricia Anderson, the undersigned, reside at 10505 Miller Road, Oakton, VA 22124.

They are undersigned and hereby certify under penalty of perjury under the laws of the United States of America that the attached document and the previous statements they have made to the Federal Election Commission in the documents submitted earlier this year are true and correct.

dated January 20, 1999

William Anderson

W. W. Anderson
Patricia Anderson
 Patricia Anderson

Duly sworn to before me this 20th
day of January, 1999.

Helen E. Marnette
Notary Public

My commission expires 11/14/01.

99-04-393

**Anderson Report
on the
FEC Audit of the
1992 Clinton for President Committee**

July 1998

Volume One of Five

PREFACE

This report is about how the 1992 Clinton for President Primary Committee made false statements to the Federal Election Commission (FEC) in order to obtain and keep some \$3 million in overpaid federal matching funds, money to which it was not legally entitled.

The 1600-page report was prepared by Patricia W. Anderson, President of Public Office Corporation (POC), and wife of POC's Chairman, William R. Anderson. It represents work done over a two-year period solely at the Andersons' expense. The Andersons' company provided extensive data management services to the 1992 Clinton primary campaign.

A reasonable question is, why has it taken so long to come forward, being based on the 1992 Clinton campaign? The answer is that the false statements were made incident to the FEC's audit of that campaign, a detailed and lengthy process. The final FEC action on the audit was not completed and released until December 27, 1994.

We point this out to make it clear that this report is being finally completed this date. It has not been kept under wraps just so it could be filed at a time replete with other Clinton Administration troubles.

The report will show how we, the Andersons, and our company, were made a scapegoat by the 1992 Clinton primary committee for improper actions taken by the Clinton Primary Committee itself.

I repeat the word "scapegoat" because there is no other word that adequately conveys the sense of injustice that prevails when a loyal and productive worker is blamed for the transgressions of the boss.

Thus, this report is our effort to set the record straight. It is also our hope that by so doing, some critical weaknesses in how this country manages its presidential elections will become apparent.



William R. Anderson
Chairman, Public Office Corporation

September 3, 1998

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The Anderson Report

July 1998

Overview

Introduction

The Anderson Report provides documentary proof that the 1992 Clinton for President Committee conspired to defraud and succeeded in defrauding the Presidential Public Funding Program of some \$3 million by submitting false statements regarding material facts to the Federal Election Commission (FEC), a federal regulatory agency.

Lyn Utrecht and Laura Ryan Shachoy signed the documents that contain most of the false statements. Lyn Utrecht, a partner in the Washington D.C. law firm of Oldaker, Ryan, Phillips & Utrecht, is general counsel to the three authorized committees established for Clinton's 1992 campaigns: the Clinton for President Committee (the Clinton Primary Committee), the Clinton/Gore '92 General Election Compliance Fund (the Compliance Fund), and the Clinton/Core '92 General Election Committee. Laura Ryan Shachoy, a lawyer in private practice in the Boston area, is co-counsel to the Clinton Primary Committee.

The Anderson Report was compiled by William R. Anderson and Patricia W. Anderson who own and manage Public Office Corporation, a vendor to the Clinton Primary Committee. The Andersons' small firm, based in Washington, D.C., and founded by them in 1978, specializes in providing data management services to the campaign committees of presidential primary candidates. These services include processing campaign contributions and presidential primary matching funds requests. The Andersons' clients have included the presidential primary committees of Senators John Glenn, Paul Simon, Al Gore, and Congressman Richard Gephardt.

William R. Anderson, a decorated veteran of the WWII Pacific submarine war, gained fame as skipper of the nuclear submarine *Nautilus* during its historic 1958 voyage under ice across the North Pole, a feat for which he was awarded the Legion of Merit by President Eisenhower. After retiring from the Navy with the rank of captain, Anderson, a lifelong Democrat, served four terms in the U.S. House of Representatives from Tennessee's 6th District. Patricia W. Anderson, his wife and president of Public Office Corporation, is a former stockbroker with extensive experience in business, data management, and FEC compliance reporting.

The Clinton Primary Committee's conspiracy resulted in it illegally acquiring some \$3 million in taxpayer money. The conspiracy succeeded for one key reason: the FEC's auditors, lawyers, and Commissioners accepted as true and pertinent certain statements made by the Clinton Primary Committee, especially about the activities of the Andersons and their firm. This is evident from documents included in the Anderson Report. These statements, which the Andersons were unaware of until early 1995 when they read the FEC's final audit report on the Clinton Primary Committee, maliciously libel the Andersons. The statements involve a series of carefully orchestrated false and misleading statements, most of them made in the Clinton Primary Committee's July 1994 written response (signed by Lyn Utrecht) to the FEC's interim audit report. The FEC auditors, apparently relying on the veracity of the Clinton Primary Committee's written responses, repeated the false and misleading statements in the final audit report of the Clinton Primary Committee, dated December 27, 1994.

After attempting without success to resolve the matter, the Andersons, in the summer of 1995, sued the Clinton Primary Committee, the Compliance Fund, and certain others, including Lyn Utrecht, for libel damages. In a motion to dismiss the Andersons' lawsuit, lawyers for Ms. Utrecht pleaded privilege, maintaining that, defamatory or not, the Clinton Primary Committee's communications with the FEC were privileged and therefore protected from libel. The motion to dismiss also offered "evidence" that purportedly proved that the statements the Clinton Primary Committee made about the Andersons were true. Ironically, once the "spin" is peeled away (a relatively easy task), the so-called evidence actually strengthens the Andersons' libel claim, as fully explained in the *Documentary References* of the Anderson Report.

Since November 1995 the Andersons have been awaiting a judicial ruling on whether the Clinton Primary Committee is, in effect, privileged to submit false and misleading statements to the Federal Election Commission.

The Andersons expect to ultimately prevail in their lawsuit for libel damages, but believe the Clinton Primary Committee should also be held accountable for making false statements to the FEC and defrauding taxpayers of some \$3 million. The Anderson Report is presented in the hope that it will prompt an investigation into the relevant actions of the Clinton Primary Committee.

The Conspiracy

The conspiracy involved the Clinton Primary Committee manipulating certain contributions received by Bill Clinton's primary campaign so as to obtain millions of dollars more in matching funds than the Clinton Primary Committee was legally entitled to, while at the same time transferring a sizable portion of the Clinton Primary Committee's primary contributions to the '92 Clinton/Gore General Election Compliance Fund, an election campaign committee that is prohibited by law from benefiting from federal matching funds. The conspiracy involved two schemes: the first failed as a result of FEC diligence; the second, which was largely based on false information, succeeded.

The contributions in question were solicited by the Clinton Primary Committee in the days and weeks prior to the Democratic Convention but deposited following Clinton's nomination on July 15, 1992, the date that marked the official end of his primary campaign. The Anderson Report and the documents it references often refer to these as post-convention or post-nomination contributions. (Note: Prior to the nomination, a primary committee is eligible to receive federal matching funds regardless of its financial position; post-convention, a primary committee must show "need," that is, to qualify for additional matching funds it must show it doesn't have enough money to pay its debts and estimated costs of winding down its activities.)

First scheme

To appear to qualify for more matching funds than it deserved, the Clinton Primary Committee deposited \$1.5 million in post-convention primary contributions into a special bank account and failed to report these as Clinton Primary Committee assets on the financial reports required to accompany post-convention matching funds requests. It also generously estimated its winding down costs. The result was that the Clinton Primary Committee looked "poorer" than it actually was, and the FEC duly paid it a total of \$4.6 million based on matching funds requests the Clinton Primary Committee submitted in August and September 1992. Of this amount, FEC auditors later stated that the Clinton Primary Committee was actually entitled to only about \$1 million.

To shift Clinton primary assets to the Compliance Fund, the Clinton Primary Committee arbitrarily distinguished between Clinton's post-convention primary contributions, depending on the date they were deposited. Contributions deposited between July 16 (the day after the official end of the primary campaign) and August 5 were treated as primary contributions, and matching funds were sought and received for

these. All remaining contributions became the focus of a certain "redesignation" project. The redesignation project was initiated and carried out by the Clinton Primary Committee in Little Rock and involved sending letters to the last 55,000 people who contributed to Clinton's primary campaign whose contributions were deposited after August 5. These letters, mailed from Little Rock during September and early October 1992, thanked contributors for their *primary* contribution, informed them that primary debts were paid, and asked them to *redesignate* their contribution to the Compliance Fund. (Note: In 1992 the general election campaigns of Clinton and Bush each received \$55 million from the FEC on condition they not accept private contributions and not spend more than \$55 million on the general election campaign. Private contributions, however, are the only source of funding for the separate legal and accounting compliance fund of a general election campaign. If there is not enough money in the legal and accounting compliance fund to pay all the general election's legal and accounting expenses, these expenses must be paid from the fixed amount allowed by law to be spent on the general election.)

Of the 55,000 primary contributors sent redesignation letters from Little Rock by the Clinton Primary Committee, some 38,000 signed the attached "redesignation form" and mailed it back to the Clinton Primary Committee headquarters in Little Rock. When the redesignation forms accumulated into a sizable batch, the Clinton Primary Committee totaled the batch and made a transfer to the Compliance Fund's bank account in an amount that exactly matched the total of the batch. These batches of signed, redesignation forms and the corresponding transfers to the Compliance Fund totaled \$2.4 million. About half the transfers were made from the Clinton Primary Committee's regular bank account and the remaining were made from the Committee's special account (interestingly called the "suspense" account) whose assets the Clinton Primary Committee had failed to reveal in its post-convention asset and debt reports to the FEC.

First scheme fails

When the FEC auditors later discovered what had happened, they requested the Clinton Primary Committee to repay \$3.6 million in matching funds "overpayments" it had received. The FEC auditors stated that diverting primary assets was "not permissible" while the Clinton Primary Committee still had debts and was requesting and receiving matching funds. FEC regulations require that primary contributions be used *first* to retire primary campaign debts and winding down costs. The FEC auditors concluded, and wrote in their audit report, that the Clinton Primary Committee

calculated that the contributions deposited between July 16 and August 5 were sufficient to enable it to obtain enough in additional matching funds so that the contributions deposited after August 5 would be surplus to its debts. This is also not permissible, however, because FEC regulations do not allow campaign committees to treat anticipated matching funds checks as accounts receivable (that is, as primary committee assets) when calculating whether primary committee assets exceed its debts. The auditors also concluded, and wrote in their audit report, "that to allow contributions solicited by, made payable to, received by, and deposited by the primary committee to be transferred wholesale to the general election compliance fund is completely inconsistent with the matching funds regulations."

In addition, the FEC auditors showed that the Clinton Primary Committee not only had the money to pay its debts, but also had the money to repay the \$3.6 million in overpayments it had received and still leave \$1 million (of the \$2.4 million transferred) in the Compliance Fund, thus utilizing some but not all the redesignations.

Nevertheless, at a fall 1993 meeting at which the FEC auditors made these points, Lyn Utrecht continued to argue that the \$2.4 million transferred was "legally and properly" designated to the Compliance Fund.

But the FEC auditors, clearly on solid legal ground, resisted this argument, and in their interim audit report, released in the spring of 1994, stated they would recommend that the Clinton Primary Committee be made to repay \$3.6 million in federal matching funds overpayments it had received.

The second scheme

In its July 1994 written response to the FEC interim audit report, the Clinton Primary Committee offered a different scheme calculated to avoid repaying the \$3.6 million in matching funds overpayments. An essential element of the second scheme involved a convoluted legal argument. Citing a rule that states that contributions received after the "last" election, and which are not properly designated "in writing" to that election, must inure to the "next" election, the Clinton Primary Committee argued three things: (1) that the contributions representing the \$2.4 million transferred to the Compliance Committee were *not* properly designated to the primary campaign, (2) were received after the primary campaign officially ended, and (3) as such were "undesignated" or non-primary contributions. (The rule cited by the Clinton Primary Committee was

intended to apply to campaigns for the U.S. Senate and House of Representatives, but the loophole is that the language refers to "federal" elections.) Based on these arguments the Clinton Primary Committee maintained that the next election was the Clinton/Gore '92 general election, but because the general election could not accept contributions, the contributions in question belonged to the general election's Compliance Fund. Moreover, it emphasized that, given the contributions in question were non-primary contributions and thus belonged in the General Election's Compliance Fund to begin with, the redesignation statements were unnecessary.

This new story left the Clinton Primary Committee with a lot of explaining to do. The biggest problem was the 38,000 redesignation statements it had obtained. These were the "in writing" proof obtained to support the Clinton Primary Committee's earlier claim, made in the spring of 1993, that the \$2.4 million transferred to the Compliance Fund was "legally and properly" designated to the Compliance Fund. But when the Clinton Primary Committee abandoned this argument (the FEC simply wouldn't buy it), the redesignation statements became a millstone around its neck, as they were the legal proof that the contributions the Clinton Primary Committee now claim were non-primary were, in fact, primary contributions, and that the Clinton Primary Committee had properly treated them as primary contributions two years' earlier.

In short, and this is the crux of the matter, the Clinton Primary Committee's second scheme wasn't credible unless it could somehow "disown" responsibility for obtaining the 38,000 redesignation statements. Its strategy for dealing with a situation it could not address truthfully (and keep the money), and could not otherwise explain, was: *blame a vendor*. The instances in which the Clinton Primary Committee did this are too numerous and lengthy to present in an overview, but are fully explained — and fully refuted — in the meticulously documented Anderson Report. A brief summary of the most significant false statements, along with the facts, are given below.

When the Clinton Primary Committee stated to the FEC in the summer of 1994 that the money transferred to the Compliance Committee represented undesignated non-primary contributions, it also stated the following:

False Statements. *The redesignations were not only superfluous but had been obtained without its knowledge by the vendor who processed the contributions and it did not find out about the redesignation statements until after the 1992 presidential election.*

The Facts

- On September 2, 1992, the day after the Clinton Primary Committee submitted its final matching funds request to the FEC, David Watkins, at that time the Clinton Primary Committee's Operations Manager, instructed Patricia Anderson to process the incoming primary contributions as quickly as possible and to each day send the results (contributor's name, address, and contribution amount) on a computer tape to Schuh Advertising, a Little Rock direct-mail company, so that Schuh could generate the redesignation letters within 60 days of the primary contribution being deposited, the time allowed by law.
- The entire primary contribution redesignation project was carried out openly by the Clinton Primary Committee in Little Rock in the early fall of 1992 and was completed, or virtually completed, well before the November elections.
- A dozen or more people working for the Clinton Primary Committee in Little Rock and elsewhere are well aware that the Clinton Primary Committee itself initiated and executed the redesignation project, and the Anderson Report names several who had intimate knowledge of the redesignation project.

False Statements. *The vendor's contract contained an incentive clause that permitted it to bill the Clinton Primary Committee for additional documentation it obtained in connection with processing a contribution (implying that the vendor's "mistake" in obtaining the redesignations was motivated by greed).*

The Facts

- There is no incentive clause in the Andersons' contract covering additional documentation for processing a contribution for the Compliance Fund. The incentive clause in the contract applies only to additional documentation relating to matching funds submissions for the primary campaign.
- The Andersons never submitted an invoice that could even remotely relate to producing and mailing 55,000 letters and paying for the return postage of some 38,000 redesignation statements. The Andersons' invoices to the Clinton Primary Committee are meticulously itemized, down to the exact number of letters, envelopes, stamps, etc.
- According to Compliance Fund records, in the fall of 1992 (the period during which the redesignation letters were mailed from Little Rock), Schuh Advertising was paid nearly \$40,000 for a "redesignation mailing" and the U.S. Postal Service in Little Rock was paid some \$10,000 for "redesignation letters."

The Clinton Primary Committee, in attempting to explain the \$2.4 million in transfers to the Compliance Fund in such a way as to disassociate the transfers from the redesignation statements, stated the following:

False Statements. *It had performed an "analysis" of the post-convention contributions not submitted for matching funds and was able to determine from this analysis which contributions were primary and which were undesignated, non-primary contributions. It stated that its analysis supported transferring some \$2.7 million to the Compliance Fund, a little more than the \$2.4 million it did transfer.*

The Facts

- The Clinton Primary Committee treated post-nomination contributions deposited between July 16 (the day after the primary campaign officially ended) and August 5, 1992, as primary contributions, and sought and received federal matching funds for these. It sent redesignation requests to every primary contributor, some 55,000, whose contribution had been deposited after August 5, 1992.
- The Clinton Primary Committee's \$2.4 million transfer to the Compliance Fund was based solely on the signed, redesignation statements returned by some 38,000 contributors (of the 55,000 solicited). The number and amounts of the transfers exactly match the number and amounts of the batches of redesignation forms accumulated by the Clinton Primary Committee as they were received. (The FEC auditors did not make a direct connection between the batches of signed, redesignation forms and the transfers to the Compliance Committee because they never saw the documentation, which is included among the evidence in the Anderson Report.)
- The difference between the \$2.7 million the Clinton Primary Committee said its so-called analysis supported transferring to the Compliance Fund, and the \$2.4 million it actually did transfer, is largely accounted for by the contributions of the some 17,000 contributors (of the 55,000 solicited) who failed to mail back signed, redesignation forms. The contributions of these some 17,000 contributors weren't transferred to the Compliance Fund; they remained as primary contributions, that is, as assets of the Clinton Primary Committee.
- The Clinton Primary Committee's so-called analysis notwithstanding, all the monies received following Clinton's nomination were in response to the Clinton Primary Committee's solicitations for *primary* contributions. Thus, there is not a wit of difference between the post-convention contributions deposited between July 16 and August 5 and the contributions deposited after August 5, and the Clinton Primary Committee was unable to satisfactorily explain a difference.
- It is worth noting that the FEC final audit report states: "Therefore, for the Commission to forego the transfer [back to the Primary Committee] from the Compliance Fund and [to forego] the recapture of matching funds in excess of entitlement from the Committee, would constitute a matching funds subsidy for the [Clinton/Gore] Compliance Committee. Such a subsidy would be well beyond the statutory scheme."
- In summing up this issue, the FEC Republican Commissioners concluded: "Finally, it is grossly improper to adopt such a free-spending standard for only one candidate (the current president of the United States), while every other campaign in the same cycle has been held to a different and stricter rule."

The above, as earlier noted, by no means covers the full extent of the Clinton Primary Committee's conspiracy, nor its false and misleading statements to the FEC, which are documented in the Anderson Report. For example, having boldly accused the Andersons of being responsible for the redesignation project, the Clinton Primary Committee attempted to make this accusation appear more plausible by repeatedly and gratuitously portraying the Andersons and their company as an unprofessional, out-of-control vendor. This was mostly accomplished by explicitly or implicitly blaming them for errors and omissions and resubmissions that the Clinton Primary Committee itself was responsible for.

Second scheme succeeds

It takes a 4-2 vote of the six FEC Commissioners to approve a recommendation by the FEC audit and legal staff; that is, to reverse the past actions of a committee. A 3-3 vote results in a "non decision" in which the FEC staff's recommendations are simply ignored. This means, in effect, that a campaign committee can get away with virtually anything that it can get the three FEC commissioners of its own party to go along with.

On December 15, 1994, the FEC Commissioners considered the FEC audit staff's recommendations with regard to the Clinton Primary Committee, the main one being that it be made to repay some \$3.6 million in federal matching funds overpayments. The vote was 3-3, a non decision, but the discussion at the meeting relating to the significance of the redesignation statements was quite enlightening. To wit, a comment by FEC general counsel Larry Noble:

... if the seeking of a redesignation is to mean anything, and the Committee claims it was a mistake, but if it is not looked at as a mistake, then what it shows is that they [the Clinton Primary Committee] first recognized these as primary contributions, and then, as Commissioner Aikens says, the regulation comes into play and says that they cannot redesignate these as long as they had debt.

A comment by Joe Stoltz, head of the FEC audit division, in response to a question about whether the funds transferred to the Compliance Fund were in fact redesignated, is likewise enlightening:

They are, assuming that the redesignation was permissible, however, if it is assumed they were primary [contributions] to begin with and required a redesignation, then I think 9003.3 comes into play, and the redesignation wouldn't have been permissible to start with.

These comments, taken together with all other statements relating to this matter that appear in FEC audit reports on the Clinton Primary Committee, make two things unambiguously clear—

- The redesignation statements (if not a “mistake”) constitute legal proof that the contributions in question were primary contributions.
- The Clinton Primary Committee would not have been permitted, by whatever means, to transfer primary contributions to the Compliance Fund as long as it had outstanding debts.

To keep the \$3 million in federal matching funds overpayments the Clinton Primary Committee had to overcome these two things, which it did, as noted above, by making false statements. To reiterate:

The first major false statement was to claim that a vendor, acting on its own and without the Clinton Primary Committee's knowledge, obtained the redesignations, stating that this was a mistake, as the redesignations were unnecessary. This false statement enabled the Clinton Primary Committee to avoid acknowledging (by denying responsibility for obtaining the redesignations) that it first recognized the contributions in questions as primary contributions, and, equally important, to denigrate the “legal” importance of the redesignations by casting them as simply a mistake by an incompetent “former” vendor motivated by greed.

The second major false statement was to claim that the monies transferred to the Compliance Fund were non-primary contributions, identified as such through an analysis of all post-convention contributions that were not submitted for matching funds. This false statement enabled the Clinton Primary Committee to present a seemingly reasonable rationale for the transfers to the Compliance Fund that disassociated the transfers from the redesignation statements.

These false statements combined to suggest a scenario that the three Democratic FEC Commissioners could plausibly go along with, and thus were essential to gaining their votes and thereby to the Clinton Primary Committee keeping the \$3 million in federal matching funds overpayments.

The scenario, aimed at the three FEC Commissioners who were Democrats, went as follows: If the contributions transferred to the Compliance Fund were non-primary

contributions (as the Clinton Primary Committee asserted), then it could be argued that the asset and debt schedules that accompanied its matching funds requests were accurate and that the transfers to the Compliance Fund while the Clinton Primary Committee still had debts were legitimate. Similarly, if the Clinton Primary Committee didn't know about and didn't have anything to do with obtaining the redesignations (as it also asserted), then it could be argued that the Clinton Primary Committee was simply acting prudently by performing an analysis of the contributions in question to determine which were primary and belonged in the Clinton Primary Committee and which were non-primary and belonged in the Compliance Fund.

The three FEC Commissioners who were Republicans were unable to exploit the legal significance of the redesignation statements because the Clinton Primary Committee maintained they were obtained by mistake by a vendor without the Clinton Primary Committee's knowledge. The Republicans were also unable to force the Democrats to acknowledge that the Clinton Primary Committee's treatment of its post-convention contributions (that is, recognizing some as primary contributions to be matched and some as non-primary contributions that could be transferred to the Compliance Fund) was both illogical and arbitrary.

Clearly, though, even the most partisan Democratic Commissioner could not have supported the Clinton Primary Committee's scenario had he or she known what the Anderson Report proves beyond any doubt whatsoever: That it was *not* a vendor but the Clinton Primary Committee itself that had sought and obtained the redesignation statements, and that the transfers to the Compliance Fund were based *not* on an analysis of the contributions in question but solely on the redesignation statements.

On December 16, 1994, the day following the 3-3 vote, the three Democratic FEC Commissioners issued a statement explaining their principal reasons for rejecting the FEC staff's recommendations regarding the Clinton Primary Committee. First, the statement said, the Commission has never addressed whether contributions coming in after the nomination *must* (emphasis in original) be treated as primary campaign assets, even if solicited by and made payable to the primary committee. Second, assuming the contributions didn't *have* (emphasis in original) to be treated as primary assets, the statement asks the question: *should* (emphasis in original) the Clinton campaign be forced to treat them as such when the intent of the donors is ambiguous and all technical requirements are not met. The statement answers this question in the following way: "We felt it inappropriate to account for these funds in a way that would deprive the

Clinton campaign of the use of public funds to pay legitimate post-primary debts." The statement calls a "Catch 22" the FEC staff's argument that if the funds transferred to the Compliance Fund are not viewed as primary assets, then the post-nomination contributions submitted for matching should likewise not be viewed as primary assets, and the matching funds associated with them should be recouped.

In answer to their own question: "What is the impact of our approach," the Democratic FEC Commissioner' stated that the impact is that: "Taxpayer funds, rather than privately raised dollars, are used to pay primary campaign expense — a result that *further*s (emphasis in original) the public financing concept. The funds at issue are left available to the [Compliance Fund] to pay for complying with the many complexities of the law — again a result that *further*s (emphasis in original) the public financing concept." The statement concludes: "All our approach does is allow the use of more public funding dollars to pay for legitimate primary campaign expenses of a publicly funded campaign. As a matter of policy, we think that is a better result than the alternative."

The Republican FEC Commissioners, in sharp contrast, issued quite a different statement following the 3-3 vote. Their statement, in effect, invited someone to challenge the FEC for failing to uphold the law. A citizen's group responded by filing Matter Under Review 4192 with the FEC, charging that the Clinton Primary Committee had been allowed to manipulate election law, illegally obtain matching funds, and spend them on other than qualified primary campaign expenses (the bulk of which went to the Compliance Fund).

The Clinton Primary Committee's written response to Matter Under Review 4192 repeated the same false statements it had earlier told FEC auditors. Lyn Utrecht, general counsel to the Clinton Primary Committee and the Compliance Fund, and Laura Ryan Shachoy, co-counsel to the Clinton Primary Committee, signed the response to Matter Under Review 4192.

The FEC general counsel, on the other hand, took a stronger position in Matter Under Review 4192 than he had taken in the final audit report on the Clinton Primary Committee. He condemned the Clinton Primary Committee's actions by recommending that the FEC Commissioners "find reason to believe" that the 1992 Clinton for President Committee, the Clinton/Gore '92 General Election Compliance Fund, William J. Clinton, candidate, and J.L. "Skip" Rutherford, treasurer, had violated 11 C.F.R. 9003.3(a)(1), 104.14(d), and 9034.5(a) when the Clinton Primary Committee:

- Submitted inaccurate financial information in its post-convention financial reports, and
- Transferred \$2.4 million to the Compliance Fund while the Clinton Primary Committee still had debts.

The vote on Matter Under Review 4192 also split 3-3 down partisan lines, with the Democratic Commissioners saying they would not reverse their earlier decision on the matter.

Conclusion

In January 1995, barely three weeks following the release of the FEC's final audit report on the Clinton Primary Committee, but before the Andersons had read it, Lyn Utrecht and Barbara Yates (CPA to the Clinton Primary Committee and the Compliance Fund and a partner in the Little Rock accounting firm of Baird, Kurtz & Dobson) requested a meeting with the Andersons at the Andersons' firm's offices near the Capitol. At this meeting Lyn Utrecht instructed the Andersons to turn over everything in their possession relating to the Clinton Primary Committee, to destroy all computer tapes and records relating to the Clinton Primary Committee, and to speak to no one about the work they had done for the Clinton Primary Committee. (A copy of a letter from William Anderson to Lyn Utrecht confirming these requests is among the documents in the Anderson Report.) Lyn Utrecht also informed the Andersons at this meeting that they would be asked to sign a statement memorializing their agreement to and compliance with these requests.

In all their years in the business, no client had ever behaved in such a fashion. Lyn Utrecht had, however, made other unusual requests. For example, during the FEC audit of the Clinton Primary Committee she had strictly forbidden the Andersons to speak to or return calls from anyone at the FEC about anything relating to the Clinton Primary Committee except on a speakerphone in her law office when she was present.

After the Andersons read the Clinton Primary Committee's false statements about them in the FEC's final audit report on the Clinton Primary Committee, the reasons for

Lyn Utrecht's astonishing and unprecedented requests were no longer a mystery. The Andersons gave the Clinton Primary Committee the documents requested, but kept selected copies and never signed a statement relating to Clinton Primary Committee documents or the work they had done for the Clinton Primary Committee.

What led the Clinton Primary Committee to break election law, make false statements to a federal regulatory agency, and maliciously libel innocent people, besmirching the Andersons' good reputations and ruining the business they'd spent years of hard work building? Was it simple greed? Was it to make sure there was plenty of money in campaign coffers to pay lawyers and accountants? Was it to cover unqualified expenses? After all, as the FEC pointed out in 1993, the Clinton Primary Committee *had* the money to pay its legitimate primary campaign expenses and debts. A simple illustration makes this clear.

The Clinton Primary Committee transferred \$2.4 million to the Compliance Fund and paid "Friend of Bill" and Arkansas businessman, W.P. Malone, a series of payments totaling \$842,100 for "professional services." The payments to Malone, which began more than a year after the primary campaign ended and continued until March 1996, were ultimately "disqualified" as legitimate primary expenses by the FEC because the Clinton Primary Committee refused, after repeated requests, to identify the services W.P. Malone had performed for Bill Clinton's 1992 primary campaign. (Even though the payments to him were disqualified, Malone got to keep the \$842,100.) In addition, the Clinton Primary Committee racked up more than \$382,000 in other non-qualified expenses, including staff bonuses and the settlement of a sexual harassment suit against David Watkins. In short, the transfers to the Compliance Fund plus the payments to Malone and the other expenses that weren't legitimate primary campaign expenses exceeded the amount the FEC auditors determined the Clinton Campaign received in matching funds overpayments.

Federal election law and federal funding of elections is designed to create a level campaign playing field. The Clinton Primary Committee cynically and maliciously made false statements — and by other means devious and illegal — thwarted this worthwhile public objective in order to keep some \$3 million in ill-gotten public money and use a sizable portion of it to subsidize the Compliance Fund of the '92 Clinton/Gore General Election campaign, giving it a \$2.4 million spending edge over Bush/Quayle in the fall of 1992, before the November elections, when it counted most.

Everybody doesn't do what the Clinton Primary Committee did.

The Andersons look forward to the U.S. Department of Justice giving this matter the serious attention it deserves. They also look forward to the Federal Election Commission taking all appropriate actions on this matter; in particular, actions that affirm that the Clinton Primary Committee and the Compliance Fund are *not* "privileged" to submit false statements to it with impunity.

Respectfully submitted to the Federal Election Commission and the U.S. Department of Justice, and sworn to under penalty of perjury this 30th day of July 1998.



William R. Anderson



Patricia W. Anderson

State of Virginia
County of Fairfax

Sworn to and subscribed before me this 30th

day of July, 1998

No. 312

My commission expires

My Commission Expires January 31, 2002

Documentary With References

Introduction

The FEC's audit of the 1992 Clinton for President Committee (Clinton Primary Committee or CPC or Committee) was controversial -- from the time the auditors recommended repayment of a record \$4.3 million to the final Commission vote which reduced it to only \$1.4 million.

That the Clinton Primary Committee manipulated the contributions received after Bill Clinton's nomination such that some were considered primary contributions (and matched with federal funds) while the remaining contributions were arbitrarily declared "non-primary" contributions (that belonged in the general election's Compliance fund) is well known.

That the FEC auditors, its general counsel, and the Republican Commissioners opposed the Clinton Primary Committee's one "legal" argument to treat its contributions in such a fashion is well known. That only the Democratic Commissioners supported the CPC's argument to do so is also well known.

That the ensuing Commissioners' tie vote had the effect of rejecting the auditor's repayment recommendation and giving tacit approval of the CPC's unprecedented actions is well known. That the tie vote left a slew of people who thought that the CPC had been allowed to violate two election laws is history.

What was not known at the time, however, by parties on either side of the controversy, was that the most significant, underlying "fact of information" the CPC had supplied to the FEC during the audit in support of its one legal argument to avoid repayment was nothing more than a string of false and misleading statements which were repeated after the audit, during MUR 4192.

The Anderson Report shows that if those at the FEC had been given truthful information, the audit outcome would have been quite different.

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CPC's First Plan:

- 1.0 CPC submits inaccurate financial statements to FEC; overpayments to CPC result.
- 2.0 CPC uses resources in Little Rock to obtain 38,000 signed redesignation statements.
- 3.0 CPC transfers \$2.4 million to Compliance fund based on batches of redesignation statements.

First Plan Fails:

- 4.0 FEC auditors on firm legal ground: illegal to request/accept matching funds and simultaneously transfer primary money to another committee - redesignation statements not permissible - FEC Interim Audit Report recommends CPC repay \$3.6 million.

CPC's Second Plan:

- 5.0 CPC introduces new strategy in its response to FEC Interim Audit Report.
- 6.0 CPC covers up its responsibility for redesignation statements with false statements.
- 7.0 Why CPC needed scapegoat - significance of redesignation statements.
- 8.0 CPC covers up correlation of transfers & redesignation statements with its "analysis".
- 9.0 CPC heaps criticism on Andersons' firm; defends all other vendors.

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- 10.0 FEC staff and Commissioners treat CPC false statements as truthful & factual.
- 11.0 Signed proof of CPC's wrongdoing is turned into "mistake by former vendor".
- 12.0 Audit outcome of Clinton for President Committee was very controversial; MUR 4192 filed.
- 13.0 After final FEC determination, Utrecht instructs Andersons to destroy CPC records.
- 14.0 Andersons' relationship with President Clinton and VP Gore comes to sad end.

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- 15.0 Andersons maintained good relationship with CPC and FEC during campaign.
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- 17.0 CPC elicited "overlimit" memo from Andersons & later used it as evidence against them.
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- 19.0 Anderson memo showed no problems during period Utrecht recalls "significant problems".
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- 26.0 Utrecht and CPC respond with hubris, arrogance, threats, and more false statements.
- 27.0 Andersons file libel claim in U.S. District Court, July 1995.
- 28.0 Utrecht & CPC filed Motion to Dismiss - claim "privilege" protects them from libel claims.
- 29.0 Andersons respond to Motion to Dismiss.
- 30.0 Utrecht and CPC reply to Andersons' response.
- 31.0 Judge listens to "privilege" arguments presented by Utrecht's attorney, November 1995.
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Andersons' Opinion on Turn of Events:

- 33.0 Andersons' conspiracy theory and how false statements crux of CPC keeping money.
- 34.0 Follow the money - how the CPC spent the overpaid matching funds.
- 35.0 Clinton/Gore '92 obtained \$2.4 million unfair spending advantage over Bush/Quayle.
- 36.0 FEC easily manipulated - various examples and critical news articles.
- 37.0 Andersons compile documents and information about false statements; turn Report over to FEC.

1.0

Clinton's nomination in July 1992 marked the official end of the primary campaign. By law, his primary committee (CPC) was no longer entitled to matching funds unless it could show in financial statements submitted to the FEC, called net outstanding campaign obligations or NOCO statements, that it didn't have enough money to pay its debts.

At that time, money was pouring into the Clinton Primary campaign. The FEC auditors would later show that the CPC had plenty of private contributions to pay its debts and that additional federal money was not necessary. The CPC nevertheless requested more matching funds.

In order to qualify for additional federal money, the CPC did two things. It began depositing contributions in a newly opened "suspense" bank account but did not report the money to the FEC as an asset and, it submitted a very high estimate of winding down obligations. Thus the CPC created a "net outstanding debt" picture to the FEC because on the NOCO statement, it appeared not to have enough money to pay its high obligations -- the CPC made itself look "poorer" than it really was.

The FEC auditors stated in their audit report two years later, that by the CPC's "not recognizing" the contributions in the Suspense account, the FEC overpaid the CPC by \$3.6 million in matching funds. The FEC's general counsel would state in MUR 4192, 6 months after the audit that submitting inaccurate financial statements to the FEC is a violation of election regulations.

The Anderson Report's supporting references are:

1.1 July 15, 1992, Clinton was nominated and the Democratic primary election was officially over; unless his Committee had debts it couldn't pay, it was "ineligible" to receive additional matching funds. From FEC Final Audit Report, Tab 28, bottom page 82:

. . . [A] candidate who has become ineligible may not receive further matching payments regardless of the date of deposit of the underlying contributions if he or she has no net outstanding campaign obligations.

1.2 An updated Statement of Net Outstanding Campaign Obligations [NOCO] must accompany each request for matching funds and should include

. . . cash on hand as of the close of business on the last day of eligibility including all contributions dated on or before that date whether or not submitted for matching.

(from FEC Final Audit Report, Tab 28, bottom page 82)

1.3 The auditors uncovered that the CPC's Net Outstanding Campaign Obligation (NOCO) statements (asset and debt financial picture) omitted contributions deposited in a newly opened "Suspense" Account. From FEC Audit Report, Tab 28, bottom page 84:

. . . [T]he Committee continued to request and receive matching funds payments based on NOCO statements that did not recognize contributions deposited into the Suspense Account.

1.4 The CPC received undeserved matching funds in September and October 1991. From FEC Open Meeting Transcript, Tab 27, page 33, Joe Stoltz, FEC Audit Division, speaking:

In doing this, the private contributions were not applied to the debt when determining remaining outstanding campaign obligations. Thus, the [matching funds] payments we [FEC] made on 9/2 [for an overpayment of \$.8 million] and 10/2 [for an additional overpayment of \$2.8 million].

1.5 In July 1995, seven months after the final audit report had been released, the FEC's general counsel stated the problem of not including all the assets in much stronger terms in his opinion for the FEC's Matter Under Review 4192. From MUR 4192 Opinion, Tab 21, Doc D, page 18:

However, the [Clinton] Primary Committee did not apply the private contributions to the primary debt and, therefore, it submitted NOCO Statements that were an inaccurate picture of the candidate's financial status. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Clinton for President Committee, and J.L. "Skip" Rutherford, as Treasurer, and William J. Clinton violated 11 C.F.R. Sections 104.14(d) and 9034.5(a).

2.0

Anticipating the infusion of undeserved matching funds, the CPC implemented its plan to use its private contributions for the advantage of the Clinton/Gore '92 general election.

The CPC requested a signed "redesignation statement" from the 55,000 contributors whose contribution had not been matched, which included all contributions which had been deposited in the "Suspense" account. The CPC, using its staff in Little Rock headquarters and a Little Rock direct firm mail named Schuh Advertising, generated and mailed the personalized letters containing a redesignation statement filled out for a specific contribution.

The CPC planned to use the signed statements that were returned as the contributors' legal authorization for transferring primary contributions to the Clinton/Gore '92 Compliance Committee (Compliance fund). Note, the Compliance fund is known generically as the general election legal and accounting committee or GELAC.

This project, the "seeking and obtaining" of the redesignation statements in September 1992, is the project the CPC's counsel, Lyn Utrecht, would state to the FEC auditors in July 1994 -- nearly two years later -- as being initiated and carried out, WITHOUT the KNOWLEDGE of the CPC staff, by its vendor which processed its contributions, namely Public Office Corporation, the firm owned and managed by Bill and Pat Anderson. She would state that the Andersons acted on their own, that they should not have obtained the documents which she termed "superfluous" to the CPC's needs. She referred to an incentive provision in the vendor's contract as the Andersons' apparent motivation.

The documents referenced in this section show that the CPC initiated and carried out the project, not the Andersons.

The Anderson Report's supporting references are:

2.1 David Watkins, CPC operations manager, instructed Pat Anderson on September 2, 1992 (the day after the last matching funds request had been sent to the FEC), to prepare computer tapes containing the contribution data of all contributions deposited by the CPC after August 5, 1992, the matching funds' request cutoff date, and send them to Schuh Advertising, a direct mail firm in Little Rock. Watkins told Anderson the project had to be completed within 60 days of the deposit date of the contribution involved; copies of Anderson's notes and tape transmittals shows Anderson sent the tapes, as instructed, to Schuh Advertising. (Tab 4, Doc A, C, D series)

2.2 Scott Schuh memo to POC regarding "Redesignation Letter." (Tab 4, Doc B)

2.3 Copy of actual redesignation letter, showing Little Rock postmark. (Tab 4, Doc E)

Note that signature font on Doc E does not match Clinton's signature font on Doc G and used by POC

2.4 Copy of actual redesignation statement that matches format & typeface of Doc E. (Tab 4, Doc F)

2.5 Examples of contribution management with references to "LR tape" (Tab 4, Doc H, I)

2.6 Page from Compliance fund's September 1992 FEC expenditure schedule, showing that the U.S. Postmaster, Little Rock, Arkansas, was paid \$10,150 for the stated purpose of "Redesignation Letters." (Tab 4, Doc J)

2.7 Another page from the Compliance fund's September 1992 FEC expenditure schedule shows payments to Lloyd Schuh Advertising (\$18,043.74 on 9/28/92 and \$19,469.83 on 9/29/92), for stated purpose of "Redesignation Mailing." (Tab 4, Doc K)

2.8 From investigator's letter (Tab 4, Doc L) after interviewing Scott Schuh:

[Scott Schuh] was familiar with the 'redesignation' and said Schuh [Advertising] also handled this for the campaign.

2.9 POC's invoice for preparing tapes sent to Schuh Advertising. (Tab 4, Doc M)

2.10 POC's revised invoice, at the request of someone in Little Rock, showing the same tapes re-invoiced, this time to the Clinton/Gore '92 Compliance fund. (Tab 4, Doc N)

2.11 Examples of contribution management and checks containing special notations pertinent to the redesignation project. (Tab 4, Doc O.2, O.3, O.4 and O.5)

2.12 Log of compliance affidavits requested by POC for month of September 1992; it does not contain any reference to redesignation statements. (Tab 4, Doc P)

2.13 POC invoices show that the CPC was not charged for anything resembling the redesignation project, or parts thereof, involving 55,000 letters or processing the 38,000 statements that were returned. (See Tab 25)

3.0

The redesignation mailing progressed and within several weeks, the CPC had received approximately 38,000 signed redesignation statements.

Between September 1992 and March 1993, the CPC staff assembled "batches" of the statements and began shifting the contributions specified on the redesignation statements to the Clinton/Gore '92 Compliance fund, for a total of \$2,444,557 transferred in 15 batches.

The Compliance fund entered the data pertinent to the redesignated contributions that was pre-filled out on the face of the redesignation statement into its own computer in Little Rock headquarters.

The CPC would later deny to the FEC that there was any relationship between the total amount transferred and the redesignation statements. Indeed, in July 1994, Lyn Utrecht stated the \$2,444,557 transferred could be accounted for by an "analysis" the CPC performed.

Documents referenced in this section show clearly that there was a relationship and that the data for the redesignated contributions was entered into computers in Little Rock; the \$2.4 million transferred had nothing to do with an "analysis" performed after the fact.

The auditors apparently never saw any documents that showed the exact correlation between the 15 transfers of money and the batches of signed redesignation statements. The auditors were never allowed to talk to Pat Anderson about anything, so of course, they did not learn about the "reconciliation" project and computerized listings of redesignated contributions generated in Little Rock.

Documents proving the relationship and correlation are contained in the Anderson Report. The original computer listings shipped from Little Rock to the Andersons are available for examination; only the first and last pages of those listings are included in the Anderson Report.

The Anderson Report's supporting references are:

3.1 A copy of the complete batch of redesignation statements used as the basis for the CPC's first transfer on 9/30/92 is in Tab 6 of this Report; attached to the batch is a copy of the original bank debit and deposit slips, each reflecting \$27,691.51, a figure which is, of course, the sum of the individual redesignation statements in the batch. These documents show that the very first transfer the CPC made was based on the "batch" of contributor-signed redesignation statements in Tab 6.

3.2 Documents showing tabulations of each individual list of redesignation statements comprising the 15 "sums" of money transferred, as produced on POC's computer during the data reconciliation project. (Tab 7, Doc A and B)

3.3 Copies of the GOA bank statements (Tab 7, Doc C and D) show the amounts transferred agree with POC's reconciliation data (Tab 7, Doc A and B). Note: The general operating account (GOA) was used as the general depository disbursement account. It was not until the "Suspense" account was opened in August 1992 that contributions were deposited in other than the GOA account.

3.4 Copies of the "Suspense" Account bank statements (Tab 7, Doc E, F, and G) show the same thing, that amounts transferred agree with POC's reconciliation data (Tab 7, Doc A and B); note the first batch transferred was on 9/30/92 in amount of \$27,691.51 (Tab 7, Doc E). That amount is also the sum of the complete batch of redesignation statements in Tab 6.

3.5 POC never received another full copy in "batch" form of redesignation statements to which to reconcile its records, rather it received a computerized report of the batch of redesignation statements; the Compliance fund's computer administrator, Allen Wegehoft, produced the reports and sent them to POC after each batch was entered on the Little Rock computer.

3.6 POC kept a log of incoming lists of redesignated contributions being sent by Allen Wegehoft of Little Rock staff (Tab 7, Doc H); Little Rock at one point sent its own summary of lists of redesignated contributions sent to POC (Tab 7, Doc I).

3.7 POC worksheet showing exact number of redesignations from each primary account (produced by Pat Anderson in November 1996). (Tab 7, Doc J)

3.8 Copy of page from the Compliance fund's FEC report shows first transfer of \$27,691.51 (Tab 7, Doc L); the following Doc M is a copy of a note made part of the same compliance report, referring to the amount \$27,691.51 as the sum of a group of "redesignated" contributions. These reports were produced by Little Rock staff and sent to FEC.

3.9 Doc N, O, P, Q, R, and S in Tab 7, are copies of subsequent Compliance fund FEC reports prepared in Little Rock and notes regarding the redesignated amounts.

3.10 POC's data "reconciliation" project also shows that the CPC made the transfers based on batches of redesignation statements and that the FEC auditors apparently were never allowed to see those documents. (Tab 14)

3.11 Transfers were made from both the regular general operating accounting (GOA) and the "Suspense" account, as shown in the summary in Tab 7, Doc A.

4.0

The FEC auditors advised the CPC general counsel and accountant of their audit findings at an "exit conference" in October 1993.

The auditors stated all assets (referring to the Suspense account assets and also, by then, the transfers to the Compliance fund) must be applied toward paying the CPC's debts before money can be transferred.

The auditors stated the CPC could not legally request matching funds for deposit into the primary bank account while at the same time transferring money out of the primary bank account to a related committee.

The auditors stated matching funds, given Clinton's post-nomination status of "ineligibility," should only be paid if on the DATE OF PAYMENT the CPC had net outstanding campaign obligations; by law, matching funds could not be viewed as a receivable asset.

The auditors viewed the redesignation statements simply as "not permissible."

At first, the CPC defended the efficacy of the signed redesignation statements -- but never stated who had obtained them.

The Anderson Report's supporting references are:

4.1 At the Exit conference, October 1993, FEC auditors told the CPC they planned to recommend a matching funds repayment of \$3,872,000. The auditors stated the repayment amount was calculated by correctly applying all of the CPC's assets toward paying its debts and obligations. (Remember, in its original NOCO statements to the FEC, the CPC did not reveal assets deposited in the "Suspense" account. From Exit Notes, Tab 26, page 8:

The repayment resulting from amounts received in excess of entitlement resulted from [the auditors] applying [all of the CPC's] private contributions to the NOCO up to last matching fund payment.

4.2 Ineligible-status candidates are entitled to federal money

. . . provided that on the date of payment there are remaining net outstanding campaign obligations.

(from FEC Final Audit Report, Tab 28, bottom page 82)

4.3 The CPC had not used its money to pay debts. From Exit Notes, Tab 26, page 8:

The Committee had instead transferred much of the post date of ineligibility contributions to the ...GELAC [Compliance fund].

4.4 Utrecht strongly disagreed with the FEC auditors. From Exit Notes, Tab 26, page 8:

L[yn] U[trecht] stated the committee strongly disagreed that any repayment was due and no further discussion was held.

4.5 In her written response to the Exit conference, Utrecht defends redesignations. From FEC Final Audit Report, Tab 28, bottom page 85:

The Committee disputes the auditors' assertion that these contributions could not be redesignated to the GELAC. That assertion is contrary to law. Those contributors properly and legally designated those contributions in writing for the GELAC pursuant to 11 CFR Section 110.[1] and the auditors cannot prohibit the Committee from maintaining those contributions in the GELAC.

4.6 Utrecht did not change the auditors opinion; they continued to hold that the redesignation statements were not permissible. From page 44, FEC Interim Audit Report, Tab 4, Doc R:

With respect to the propriety of the redesignation, 11 C.F.R 110.1 is not the relevant regulation. That regulation specifies the procedures and time limitations that apply to a redesignation when a redesignation is appropriate. As stated above, 11 CFR 9003.3(a)(1)(iii) clearly states that the redesignations pursued by the Committee were not permissible. That section states that only if no remaining primary expenses are to be paid, may primary contributions not in excess of the contributors' limit be redesignated to the compliance fund.

4.7 The FEC Interim Audit Report (April 1994) gave the CPC an opportunity to give more evidence that repayment was not warranted. From FEC Interim Audit Report, Tab 4, Doc Q, page 45:

The Audit staff recommends that within 30 calendar days of service of this report, the Committee provide evidence to demonstrate that it did not receive matching funds in excess of entitlement. Absent such a demonstration, the Audit staff will recommend that the Commission make an initial determination that the Committee repay \$3,674,353 to the U.S. Treasury. This amount is subject to change upon further review.

5.0

Between the time of the Exit conference in October 1993 and the FEC auditors' Interim Audit Report in April 1994, the CPC had time to see the repayment handwriting on the wall -- the Andersons believe the CPC's counsel, Lyn Utrecht, must have known the CPC was in for a huge repayment long before the Exit conference.

She must have known that what actually happened -- the CPC took matching funds money from the FEC based on "need" while simultaneously shifting "excess" assets to the Compliance fund -- was not something the Democratic Commissioners could support, no matter how much they wanted to. Another strategy would be required if the CPC was to avoid a huge repayment.

The CPC, in an incredible reversal, unveiled in July 1994 a "new" strategy which no longer encompassed the redesignation statements.

Utrecht's new strategy asserted the contributions received by the Primary Committee after Clinton's nomination were not properly designated to the Primary Committee. If not properly designated for the "last" election (the primary) then the contributions rightfully belonged to the "next" election (being the Clinton/Gore Compliance fund). She (and eventually the Democratic Commissioners) ignored the fact that the federal law cited obviously applied to Senate and House campaigns. She also ignored the fact that millions of dollars in contributions received after Clinton's nomination had been matched (only primary contributions may be matched).

Lyn Utrecht's "new" strategy completely abandoned the redesignation statements -- calling them "superfluous" -- and claimed the contributions that had been transferred to the Compliance fund belonged there all along -- therefore redesignations were not necessary!

The Anderson Report's supporting references are:

5.1 Utrecht's statements (July 1994) revealed a "new" strategy to keep the money. From CPC's Interim Audit Response, Tab 23, Doc A, page 39:

The auditors argue that these amounts were improperly redesignated from the Primary Committee to the Compliance Fund and therefore should be transferred back to the Primary and included as assets of the Primary Committee.

5.2 Utrecht stated auditors had wrong perspective -- no "re" designation was necessary. From CPC's Interim Audit Response, Tab 23, Doc A, page 39 & 40:

This position is incorrect for numerous reasons set out more fully below, including the following: first, under 11 C.F.R. 110.1(b)(2)(ii), over \$2,444,557 of these contributions were in fact contributions to the Compliance Fund and no redesignation was necessary. . . .

5.3 Utrecht argued the contributions belonged in the general election's Compliance fund. From CPC's Interim Audit Response, Tab 23, Doc A, page 40:

. . . [A] contribution not designated in writing is considered a contribution for the next election after the contribution is made. Thus, contributions received after the date of the primary or nominating convention, as applicable, are considered for the general election.

5.4 Utrecht argued the contributions the auditors considered redesignated were not properly designated to the primary and therefore are not primary contributions. From CPC's Interim Audit Response, Tab 23, Doc A, page 40:

The auditors focused here on whether these contributions were properly redesignated to the Compliance Fund, but, in fact, in order to have been considered primary contributions in the first instance, the regulations required that they be designated in writing for the primary. Very few of them were so designated.

5.5 The bold typeface shown in items 5.3 and 5.4 above are Utrecht's original bold in CPC's Interim Audit Response, emphasizing that the contributions "legally" belong to the Clinton/Gore Compliance fund (the only "next election" possible) because they were not properly "designated in writing" for the primary just ended. She makes the case that REdesignations are not necessary if the contributions were not properly designated to begin with.

5.6 Republican Commissioner Potter would later say that this argument was contrary to law. From FEC Open Meeting Transcript, Tab 27, page 78:

The argument is that our regulations say that if you get money after the date of one election, if it is not designated, it is presumed to be for the next election. That regulation obviously applies to House and Senate committees.

5.7 As a former staff lawyer at the FEC, Utrecht must have known if the three Democratic Commissioners would see her view of the arguments -- which they did, especially regarding the "designated in writing" requirement -- the CPC would avoid full repayment and the money transferred to the Compliance fund would remain there. (Refer to Democratic 'Reasons', Tab 21, Doc AA and FEC Open Meeting Transcript, Tab 27.)

6.0

Utrecht covered up the CPC's responsibility for treating the contributions as primary contributions and as if redesignation statements were needed before the money could be transferred to the Compliance fund. Had FEC auditors or general counsel known that the CPC had obtained the redesignation statements and made transfers based on batches of the "in writing" statements, it would have refuted Utrecht's "new" strategy.

Utrecht's explanation for the existence of 38,000 redesignation statements -- documents which the CPC had obtained nearly two years earlier but which could now shoot holes through the "new" strategy -- was to state to the FEC auditors that the CPC's vendor which processed its the contributions obtained the redesignation statements.

Utrecht coolly blamed an innocent vendor for the CPC action. She stated the vendor, the Andersons' firm, obtained the "unnecessary" documents without the knowledge of the CPC's staff and for the financial incentive stipulated in the Andersons' contract (which, she added had been negotiated not by her but by the CPC's original counsel).

Thereafter, the FEC regarded the signed statements as "a mistake by a former vendor" and thus insignificant in any official or legal sense -- certainly not proof of the CPC's wrongdoing -- which they were.

The Anderson Report's supporting references are:

6.1 Utrecht claimed the CPC had nothing to do with the REdesignations. From CPC's Interim Audit Response, Tab 23, Doc A, page 40:

The auditors focused here on whether these contributions were properly redesignated to the Compliance Fund, but, in fact, in order to have been considered primary contributions in the first instance, the regulations required that they be designated in writing for the primary. Very few of them were so designated. The Committee's vendor who processed these contributions treated them as "redesignations" even though they were not. That vendor's contract had been negotiated early in the campaign by the Committee's original counsel and included an incentive for the vendor to treat contributions as though additional documentation or affidavit was necessary. Under the contract, the vendor received an additional amount per contribution for which additional documentation or affidavit was obtained. The Committee staff did not see these contributions until well after the election, but relied solely on the vendor's expertise to handle the contributions appropriately.

6.2 After falsely blaming the Andersons for obtaining them, the CPC boldly stated that the redesignation statements were proof the contributor wanted the contribution to go to the Compliance fund. From CPC's Interim Audit Response, Tab 23, Doc A, page 41:

In those instances where they were not totally superfluous the 'redesignations' sought and obtained by the Committee's vendor merely serve as confirmation that the contributors intended these contributions to be made to the Compliance Fund since there may have been some ambiguity in the way in which the checks were made out or in the unsigned cards that were attached to the checks.

6.3 Throughout her Response, Utrecht disassociates the CPC from the true origin and purpose of the redesignation statements. From CPC's Interim Audit Response, Tab 23, Doc A, page 41:

The 'redesignations' obtained by the Committee's vendor, although redesignation was a misnomer, serve as documentation of the contributors' intent to make contributions to the Compliance Fund.

6.4 Utrecht's false, harsh statements turned the redesignation statements into "a mistake by a former vendor" (FEC General Counsel's Opinion, Tab 21, Doc A, bottom page 158).

6.5 From FEC Open Meeting Transcript, Tab 27, Page 90, comment by FEC General Counsel Lawrence Noble:

Yes, but if their [the CPC] seeking a redesignation is to mean anything, and the Committee [CPC] claims it was a mistake, but if it is not looked at as a mistake, then what it shows is that they [CPC] first recognized these as primary contributions, and then as Com. Aikens says, the regulation comes into play and says that they cannot redesignate these as long as they have debt.

7.0

Why did Utrecht need to coverup, by blaming a vendor, the true origin of the redesignation statements?

Because the "in writing" proof of designation Utrecht was now claiming was necessary -- but lacking -- was manifest in the redesignation statements.

Ironically, the CPC had obtained -- but now needed to coverup and disassociate itself from -- the evidence that the contributions were properly designated in order to clear the way so it could claim proper designation "in writing" didn't exist!

The Anderson Report's supporting references are:

7.1 Utrecht's new arguments completely ignored, indeed were contrary to, the fact that months earlier the CPC had thanked 55,000 contributors for their primary contribution -- the very contributions she was now arguing were NOT primary contributions. Her new arguments also ignored the fact that in the same letter, the CPC requested that the contributor sign over the primary contribution to the Compliance fund. In her new arguments, Utrecht was stating that the contributions, being undesignated, belonged in the Compliance fund straight away and that redesignation statements were unnecessary. The CPC's affirmative act of seeking and obtaining the redesignation statements was in and of itself evidence to refute Utrecht's new arguments. (Sample letter Tab 4, Doc E)

7.2 Add the fact that 38,000 of the contributors signed the REdesignation statements and returned them to the CPC's Little Rock headquarters and the fact that the CPC then used the statements as the basis for making \$2,444,557 in transfers to the Compliance fund -- and you have the corker.

7.3 If that were not enough, unless the CPC was ready to call its own actions unwarranted and its contributors too stupid to know what they were doing by responding to the CPC's request, the signed redesignation statement provided "designated in writing" evidence that the donor's original intent was to contribute to the primary. It was only after being requested by the CPC to do so, did the contributor sign over the primary contribution to the Compliance fund. (Actual signed statement Tab 4, Doc F; complete set used as basis for transfer in Tab 6)

7.4 Utrecht must have known that the Democratic Commissioners could not support her "new arguments" unless the CPC's past affirmative actions of seeking and obtaining the statements could be covered up. And, most importantly, she had to somehow obscure the fact that the contributor-signed documents were, in fact, the "designated in writing" proof that her new arguments claimed did not exist.

7.5 Utrecht accomplished this by giving the FEC false information about the origin of the redesignation statements. Her intent must have been to discredit the validity of the redesignation statements by discrediting the 'why and how' they came into existence. She covered up the relationship between the batches of redesignation statements and the transfers by withholding relevant documents from the auditors and claiming the transfers were based on an "analysis" the CPC had made after the fact.

8.0

Utrecht had covered up the CPC's responsibility for seeking and obtaining the redesignation statements by blaming the Andersons' firm. How did she plan to coverup the fact that the 15 transfers made from the CPC's bank account to the Compliance fund's bank account for \$1.4 million was based on 15 batches of signed redesignation statements?

Utrecht again made a completely false statement when she informed the FEC that the CPC performed an "analysis" on the contributions the CPC received after Clinton was nominated but which were not submitted for matching funds and determined how much could be transferred. She stated that the CPC could have transferred approximately \$2.7 million and that accounted for the \$2.4 million that was transferred.

Utrecht made no mention of the 15 batches of redesignation statements that correlated precisely with the amounts of money transferred.

The auditors apparently never saw the documents relating to the batches of redesignation statements. Thus, Utrecht covered up the correlation of 15 transfers to redesignation statements with an inventive "analysis."

The Anderson Report's supporting references are:

8.1 Utrecht had to somehow account for the \$2,444,557 that had been transferred to the Compliance fund and keep from the FEC the evidence that there was a strict correlation between the batches of redesignation statements and the 15 bank transfers, both of which added up to exactly \$2,444,557. From the CPC's Interim Audit Response, Tab 23, Doc A, page 41:

Of the contributions received after the date of ineligibility and not submitted for matching, more than \$2,773,327 was neither clearly designated for the primary or primary debt nor accompanied by a signed written designation for the primary or primary debt. The Committee's analysis of these contributions is attached as Exhibit 3 to the General Committee Response. These contributions were not, therefore, primary contributions because they did not meet the requirement of 11 C.F.R. 110.1(b)(4). This number accounts for the \$2,444,557 transferred from the Primary Committee and the Suspense account to the Compliance Fund, and thus, these funds are not properly considered primary contributions redesignated to Compliance.

8.2 Thus the CPC covered up and otherwise obscured from the FEC auditors the fact that it made 15 transfers of money each of which correlated exactly with a "batch" of redesignation statements; the sum of individual statements within each batch equals the exact amount transferred. The Anderson Report's factual references for the transfers the CPC made are in sections 3.0 through 3.10 and documents are in Tab 7.

8.3 It is apparent that the auditors were never allowed to examine the original batches of redesignation statements, the files on the Compliance fund's computer maintained by Allen Wegehof, or any documents relating to POC's data "reconciliation" project. POC summarized the data reconciliation project in two, 3-inch binders, a set of which was sent to Utrecht in April 1993. (Reconciliation project documents are in Tab 14.) Two of the original three sets still exist and they are currently in the possession of the Andersons.

8.4 The correlation between the transferred amounts and batches of redesignation statements is not mentioned or referred to in any FEC audit documents, yet substantial documentation and proof exists, much of it presented in this Report, that there is a strict correlation. A complete copy of the first "batch" of redesignation statements used by the CPC to make a transfer also exists and is included in this Report (Tab 6). There can be no doubt that the transfers were made based on redesignation statements and not on the "analysis" referred to by Utrecht.

9.0

Lyn Utrecht heaped criticism on the Andersons and their firm, Public Office Corporation, while defending all other vendors.

The Anderson Report's supporting references are:

9.1 After an examination of Utrecht's harsh and defamatory statements about the Andersons, which the auditors repeated throughout the final audit report, it becomes obvious that these statements were concocted solely to portray the Andersons and their firm, POC, to the FEC as highly unethical and incompetent. Neither the FEC nor readers of the Final Audit Report (a document which has the appearance of containing, at the very least, thoughtful and factual findings) would have no way of knowing, or even suspecting, that the Clinton Primary Committee's gratuitously harsh and defamatory statements were simply an element in their scheme to keep some \$3 million it was not entitled to.

Utrecht led the FEC to believe, and had to make it plausible for it to believe, that the Andersons were capable of initiating and executing a massive, "superfluous," project of sending a letter to 55,000 contributors, sign the letter with a facsimile of Bill Clinton's signature, and receive and process the 38,000 signed statements that were returned -- all WITHOUT the CPC's knowledge -- with the motive of increased fees.

But the Andersons, in addition to having absolutely no responsibility for the seeking or obtaining of the redesignation statements, performed their responsibilities superbly for the CPC as shown in the discussion and documents in Tabs 8, 10, and 11. Pat Anderson was warmly and openly praised by Christine Varney, the CPC's second general counsel, for POC's excellent services at the office of Hogan and Hartson on September 24, 1992 (Utrecht, Yates, Keeley Ardman, and Patty Reilly also in attendance).

Keeley Ardman was POC's direct supervisor in Little Rock Headquarters and was also head of the CPC's compliance reports. Patty Reilly is an attorney and augmented Ardman's effort in compliance related matters. Both were also involved with the Audit.

9.2 Contrary to Utrecht's false characterization that the Andersons performed unnecessary services just to increase their fees, the Andersons were not greedy. They carefully itemized each invoice and charged the CPC according to its fee schedule. The contract and invoices in Tab 25 bear this out. Not only were the Andersons not greedy, they were very generous. As discussed in Tab 5, due to high volume, the Andersons, at their own initiative, lowered fees to the CPC, saving the CPC more than \$130,000.

9.3 The following false and defamatory statement by Lyn Utrecht, made in the CPC's Interim Audit Response (Tab 23, page 2 and discussion in Tab 8), makes the Andersons appear irresponsible:

. . . [T]hese misstatements were essentially due to errors by one of the Committee's computer vendors who failed to reconcile her records to the accounting data and bank reconciliation provided to her by the Committee's accounting department.

The CPC never gave Pat Anderson accounting data and bank reconciliations to which to reconcile at any time during 1992 and the FEC auditors were never allowed to examine Andersons' extensive records.

9.4 The FEC auditors were not given any records either. From FEC Final Audit Report, Tab 28, bottom page 9:

The Committee did not maintain workpapers, bank reconciliations or other records which demonstrated how the amounts contained on its disclosure reports were prepared. Absent such information, the Audit staff was not able to identify the reasons for the misstatements described above.

Although the Audit staff had requested all workpapers and bank reconciliations during the pre-audit inventory and during fieldwork, none was provided which related to the original reports filed with the Commission.

The Report's documents concentrated in Tabs 4 through 14, are samples of workpapers and other records the FEC wanted to examine but were never given the opportunity. The FEC auditors had to request documents directly from the CPC and the auditors never saw any of Pat Andersons' records. But the CPC, who began paying storage on the workpapers and documents in July 1993, must have known about them (Tab 8, Doc NN and OO). An inventory of the documents, which itemizes 16 notebooks for "compliance," is in Tab 24, back of Doc AA.1)

9.5 Even though the auditors were satisfied with the amendments, for which POC prepared all the contributor data, Utrecht made another false and defamatory statement. From CPC's Interim Audit Response, Tab 23, Doc A, page 3; discussion Tab 8:

The Committee further notes that many of the errors occurred during June, July and August of 1992. During this period, the Committee experienced significant difficulties with the vendor preparing the Primary Committee's reports.

9.6 The following false and defamatory statement appeared as part of the CPC's explanation for use of a Little Rock computer, an issue in which POC was not involved. From Attachment 5, FEC Final Audit Report, Tab 28, bottom page 122:

Data necessary for preparation of amendments necessary to debt schedules originally prepared by POC covering inception through March, 1993 has been reconstructed by the Committee. Amended reports were prepared and filed.

Amazing. The CPC used "POC" again as a scapegoat -- this time as the excuse for buying a computer. Documents in Tab 9 show that POC assisted the CPC during the first months of the campaign in putting its data in a format acceptable to the FEC. Beginning May 1992, the CPC produced its own schedules entirely independent of POC, often sending the schedules to the FEC directly from Little Rock. To blame POC for the Debts and Obligations data is ludicrous on another count; POC simply never had in its possession the source documents which reflected the CPC's debts or obligations. POC couldn't have possibly put together the debts and obligations schedules -- but the FEC auditors didn't know that.

9.7 The following statement misleads the FEC into thinking the CPC began in "late 1992" to rely upon its own staff for services POC was providing. From Attachment 5, FEC Final Audit Report, Tab 28, bottom page 122:

During late 1992 and early 1993, the Committee began the difficult task of moving the POC maintained data to Committee computer in Arkansas.

The CPC did not begin to pull away from POC in late 1992 (except to get a copy of POC's main database to merge with a political database); the CPC did not receive its final copy of the contributor and other financial data from POC until December 1993. POC led the way in helping the Little Rock accounting department get its data balanced and prepared the amendments which Lyn Utrecht filed from her offices in July 1993. POC filed the CPC's compliance reports for the 3rd quarter of 1993. Documents in Tab 10.

9.8 The following misleading statement gives a negative impression of POC's matching funds capabilities; here Utrecht is trying to make the case that the CPC could have received more matching funds if only its vendor (POC) hadn't processed the contributions so slowly. From CPC's Interim Audit Response, Tab 23, page 42:

Second, this method results in unfairness to a candidate who processes contributions more slowly. For example, if contributions received during one month are not processed fast enough to be included [in] the submission at the beginning of the following month, then there can be a two month delay in receiving the funds.

Additional information about this misleading and defamatory statement is in Tab 11. Documents there show that POC kept up with the processing of contributions for matching funds and processed contributions as received from Little Rock. The POC report marked Document G shows that all contributions received during the month of May, including right through the last day of the month, were submitted for matching on the June 1 submission. Note that May 29th was a Friday and May 30th a Saturday. That matching funds report was paid by the FEC near the end of the month of June. The contribution deluge began in June. The matching fund report submitted in July that contained the June contributions was paid at the end of July, two weeks after Clinton had entered the period of ineligibility. Thus, POC was absolutely current for all possible matching funds payments paid by the FEC prior to Clinton's period of ineligibility.

The Andersons include reports and deposit information that show that their processing of contributions was very fast and, prior to Clinton's period of ineligibility, kept up with submitting contributions for matching -- sometimes as quickly as the same day the contribution was deposited in the bank. The CPC also benefitted from POC's high accuracy ratings. POC was especially innovative, aggressive, and timely in its processing of affidavits, a remarkable and error-free facet of the matching funds submissions which alone added \$1,477,506 to the total matching funds paid to the CPC that it otherwise would not have received payment for.

9.9 There is a glaring contrast between Utrecht's defamatory statements about the Andersons and her statements defending the actions of the other committee vendors; for example, from CPC's Interim Audit Response, Tab 23, page 7:

For instance, the Audit staff has included in its analysis of extensions of credit, situations involving obvious clerical and bookkeeping mistakes which were rectified by the Committee and vendor prior to Commission action. To penalize the Committee for rectifying administrative and clerical errors, penalizes the Committee for making a good faith effort to voluntarily comply with the law and accordingly undermines one of the basic tenets of federal election law. . . .

It is worth noting that though the FEC auditors complained about certain "misstatements" and certain itemization errors, they clearly stated the information had been corrected in the amendments (prepared by POC). The FEC auditors were not, and did not, make any repayment recommendations or even suggest a fine or the like, for any matters relating to the "misstatements" or the itemization errors. Nevertheless, Utrecht made harsh, defamatory statements about the CPC vendor.

Again, Utrecht defends other CPC vendors, from CPC's Interim Audit Response, Tab 23, page 8:

In several instances, the vendors inadvertently made bookkeeping errors in the billing process. . . . Inadvertent bookkeeping errors are unavoidable in the operation of any business and, therefore, are within the normal and ordinary course of business. Moreover, in each instance, the attached affidavits demonstrate that the vendors clearly intended to comply with the law by providing evidence of a signed contract, or reasonable explanations such as obvious bookkeeping errors, later discovered and immediately rectified. Most importantly, the vendors and Committee rectified these errors as soon as discovered. To penalize vendors and the Committee where inadvertent mistakes were made and immediately rectified upon discovery would seriously undermine the Commission's mission to encourage voluntary compliance. In fact, it would discourage parties from rectifying innocent errors.

9.10 In contrast to 9.9 above, Utrecht heaped so much criticism on POC that the auditors reminded the CPC it was still responsible. From FEC Final Audit Report, Tab 28, bottom page 10:

Irrespective of such vendor problems, the Committee itself, and its treasurer, have the responsibility of complying with 2 U.S.C. 434(b)(3)(A) and 11 CFR 104.3(a)(4).

10.0

Did the FEC staff and Commissioners treat Utrecht's false statements as truthful and factual?

More importantly, did the false information influence the audit outcome.

The answer: Absolutely!

The Anderson Report's supporting references are:

10.1 The intent of Utrecht's most egregious false statement must have been to mislead the FEC into thinking that the CPC had no knowledge of, and no responsibility for, seeking and obtaining over 38,000 redesignation statements. Given Utrecht's arguments that the contributions in question were not properly designated to the primary "in the first instance," the CPC could not afford for anyone at the FEC to know that the CPC had treated the contributions as properly designated primary contributions and had itself asked the contributor to REdesignate the contribution to Compliance.

The following are excerpts from various documents which indicate that Utrecht's false statements were interpreted by those at the FEC as Utrecht intended:

10.2 The auditors repeated Utrecht's completely false version of "by whom and why" the redesignation statements were obtained. From FEC Final Audit Report, Tab 28, bottom page 87:

The Committee states that the redesignations were obtained by the vendor who [sic] processed the contributions for the Committee without the Committee's knowledge. The explanation suggests that due to provisions in that vendor's contract, the vendor stood to gain by sending the redesignation requests.

10.3 The FEC's general counsel stated his understanding in his opinion. From FEC Final Audit Report, Tab 28, bottom page 158:

The Primary Committee contends that the redesignations were performed by mistake by a former vendor.

Note that the above comment puts together the blame and POC. POC was the only vendor whose relationship with the CPC (it was announced in Attachment 5, Final Audit Report) would be terminated, hence the use of the FEC general counsel's use of the word "former" in referring to the vendor, that is POC.

10.4 From a comment by Mr. Joe Stoltz (FEC Audit Division) during the Commission meeting. From the FEC Open Meeting Transcript, Tab 27, page 34:

. . . [A]nd that therefore, the redesignations were unnecessary to transfer these amounts, and were a mix-up of some sort with the Committee's computer vendor and should not have been sent to begin with.

10.5 Democratic Commissioner Thomas stated at the Commission meeting the vendor obtained the redesignation statements. From FEC Open Meeting Transcript, Tab 27, page 56:

Their vendor went so far as to cover themselves and get what they were calling redesignations.

10.6 And, Democratic Commissioner McGarry states:

I think even if it was wrong to get the redesignation, that they properly did within 60 days, it wasn't something that the contributor wasn't a party to.

(Also from FEC Opening Meeting Transcript, Tab 27, page 91)

11.0

Utrecht's deftly turned written proof of the Clinton Primary Committee's wrongdoing into a "mistake by a former vendor."

Blaming the vendor for greedily obtaining the redesignation statements by "mistake," set up Utrecht's arguments that the contributions in question were "non-primary" contributions, an argument that the Democratic Commissioners supported. The tie 3-3 Commissioner vote allowed the CPC to reduce by nearly \$3,000,000 the amount it had to repay the U.S. Treasury.

The Anderson Report's supporting references are:

11.1 The following comment by Lawrence Noble, general counsel at the FEC, indicates that had the FEC known that the redesignations were not a mistake, the applicable regulation would force the CPC's full repayment and a reversal of the transfers to the Compliance fund. From FEC Open Meeting Transcript, Tab 27, Page 90, emphasis added:

Yes, but if the seeking of a redesignation is to mean anything, and the Committee claims it was a mistake, but if it is not looked at as a mistake, then what it shows is that they [the Primary Committee] first recognized these as primary contributions, and then as [Republican] Com. Aikens says, the regulation comes into play and says that they cannot redesignate these as long as they had debt.

11.2 The following dialogue shows where Democratic Commissioner Thomas came close to a defining moment regarding the redesignations but caught himself and backed off. The dialogue is quoted below, beginning with Commissioner Thomas and is from the FEC Open Meeting Transcript, Tab 27, page 92:

Commissioner Thomas: Joe, aren't all the monies that are at issue that were moved over to GELAC in fact redesignated?

Mr. Stoltz: They are, assuming that the redesignation was permissible, however, if it is assumed they were primary [contributions] to begin with and required a redesignation, then I think 9003.3 comes into play, and the redesignation wouldn't have been permissible to start with.

Commissioner Thomas: If.

Mr. Stoltz: If.

11.3 The CPC was ultimately required to repay only \$1,072,344 of the nearly \$4 million in overpaid matching funds. Due to other factors in the audit, the repayment of matching funds alone would have been more than \$3,000,000 if the CPC had not been able to pull off its scheme of declaring primary contributions NOT primary contributions, beginning on the arbitrary date of August 6, 1992. Central to the successful scheme was the CPC's ability to place the responsibility of the redesignation statements on the Andersons and thus Utrecht's false statements turned the CPC's proof of wrongdoing into a "mistake by a former vendor." (Tab 21, Doc A, bottom page 158)

12.0

The FEC's audit of the 1992 Clinton for President Committee (Clinton Primary Committee or CPC) was controversial -- from the time the auditors recommended repayment of a record \$4.3 million to the time the final decision was made to reduce it to \$1.4 million.

That the FEC auditors, its general counsel, and the Republican Commissioners opposed the Clinton Primary Committee's "legal" argument to avoid repayment is well known. That only the Democratic Commissioners supported the CPC's argument is well known. That the ensuing Commissioners' tie vote had the effect of rejecting the auditor's repayment recommendation. That the tie vote left a slew of people who thought that the CPC had been allowed to violate two election laws is also history.

What was not known at the time, however, by parties on either side of the controversy, was that the most significant, underlying "facts of information" the CPC had supplied to the FEC in support of its one legal argument to avoid repayment was nothing more than a string of false and misleading statements.

The Anderson report shows that at the time the referenced opinions were written, the parties on both sides of the controversy were treating completely false and misleading statements as true and factual. The false information, treated as truth, paved the way for the Democratic Commissioners to support the Clinton Primary Committee. On the other hand, the false information, treated as truth, provided an insurmountable stumbling block for those who opposed the CPC's argument.

The referenced opinions are:

12.1 Did the FEC Commissioners' 3-3 vote allow the 1992 Clinton Committees to violate election law?

Yes, stated the FEC's auditors -- reference Tab 28, pages 82-95 of FEC Final Audit Report of the Clinton Committee and Tab 27, the FEC Open Meeting Transcript.

Yes, stated the FEC's general counsel and legal staff, in an opinion regarding the audit findings for the CPC -- reference to Tab 21, Doc A, bottom pages 157-159 and Tab 27, FEC Open Meeting Transcript.

Yes, stated the FEC's general counsel and legal staff, in an opinion regarding the audit findings for the Clinton/Gore '92 Compliance and general election committee -- reference Tab 21, Doc B, bottom pages 119-122.

Yes, stated the Republican Commissioners in their "Statement of Reasons" regarding the Clinton for President Committee final audit outcome -- reference Tab 21, Doc C.

Yes, stated the concerned citizens who filed MUR 4192 -- reference Tab 22, Doc A.

Yes, stated the FEC's General Counsel and legal staff, in an opinion regarding MUR 4192, when they found the CPC violated two election laws -- reference Tab 21, Doc D, page 16 and 18.

Yes, stated the Republican Commissioners in their "Statement of Reasons" regarding their vote on MUR 4192 -- reference Tab 21, Doc E.

Yes, stated the interested citizens' group which filed suit against the FEC for failing to enforce the election laws -- reference Tab 22, Doc B, U.S. District Court Case 1:95CV01923.

Yes, stated various analysts and commentators in the election and lobbying community -- reference Tab 21, Doc F and all G's.

12.2 The Commissioners' 3-3 tie vote did not allow the 1992 Clinton Primary Committee to violate election laws -- rather the concept of public financing of presidential elections was "furthered."

So stated the Democratic Commissioners in their "Statement of Reasons" regarding the Clinton for President Committee final audit outcome -- reference Tab 21, Doc AA.

So stated the Democratic Commissioners in their "Statement of Reasons" regarding their vote on MUR 4192 -- reference Tab 21, Doc BB.

13.0

Utrecht asked the Andersons to destroy the Clinton Primary Committee's original data.

The Anderson Report's supporting references are:

13.1 Shortly after the Commission meeting on December 15, 1994, (which resulted in a 3-3 vote that signified the Clinton scheme to defraud taxpayers of some \$3 million had succeeded), Utrecht called for a meeting with Bill and Pat Anderson. The meeting was held in POC offices on January 25, 1995. Note, at the time of the meeting, the Andersons were still unaware Utrecht had made outrageous false statements to the FEC about POC's services. And, the Andersons did not know that the CPC had advised the FEC months earlier that the relationship between the CPC and POC would be terminated as soon as possible.

13.2 In fact, the Andersons had been asked in September 1994 by Marsha Scott and Mark Middleton, top White House aides, to submit proposals for POC to compile a large database for the White House -- one that would be used as the initial fundraising tool for President Clinton's 1996 reelection campaign. (Details of the White House Connection in Tab 16.) Scott and Middleton stated to Pat Anderson what a good job POC had done for the CPC during 1992. They stated to Pat Anderson at a meeting at the Hay-Adams Hotel on September 13, 1994, that they would like to see POC do some more good work for Clinton in 1996. Scott arranged for Pat Anderson to talk to Erich Vaden at the White House, which she did, and also asked POC, on several occasions during the fall of 1995, to submit information and cost estimates for POC's services for the 1996 reelection to the White House. Because of the solicitous actions of two White House aides, it is easy to understand why the Andersons were not prepared for what was about to happen at the meeting with Utrecht.

13.3 Utrecht, with Yates and Wegehoft silently looking on, instructed the Andersons to destroy the computer files of the Clinton campaign. They were instructed to deposit everything they had in their possession that related to the 1992 campaign and deposit it in the storeroom, which already held most of the records the Andersons had generated during the 1992 Clinton campaign. Utrecht stated flatly the relationship between the CPC and the Andersons would be terminated as soon as Allen Wegehoft completed certain of his data conversions. The Andersons were told they would be asked to sign a certification that they had complied with the instructions. The Andersons were stunned. In the hours after Utrecht, Yates, and Wegehoft left POC's offices, the Andersons couldn't see how Utrecht was aware that Scott and Middleton had been praising POC and asking for proposals for future work while she was firing the Andersons.

13.4 Pat Anderson, who had worked very closely with Middleton throughout the 1992 campaign, remained confident that Scott and Middleton's requests had been sincere and that they wanted POC to participate in the 1996 reelection campaign. Ignoring Utrecht's firing, Pat Anderson, who had heretofore submitted information to the White House only at the request of Scott or Middleton, now decided to send to Scott and Middleton a full-blown proposal for the 1996 reelection campaign. Bill Anderson, in the meantime, decided to learn more about the final audit outcome and requested a copy of the Clinton committees' final audit reports from the FEC.

13.5 Anderson also wrote a letter to Utrecht on February 6, 1995, confirming Utrecht's instructions to POC (from Tab 24, Doc AA.1) and stating:

We have never been called upon during our 17 years in business to destroy the total of a customer's files.

13.6 Utrecht responded with her own letter dated February 16 (from Tab 24, Doc BB) which states, among other things:

You will notify us just prior to the deletion of the last set of files, and we will tender payment to you in full. Upon deletion of the final files, you will sign a certification that you no longer have any copies of Clinton for President data or records in any media or format.

I am giving you these instructions as Counsel to the Committee, and instructing you that no one else have [sic] the authority to do so. As a Committee vendor, you do not have the authority to discuss the Committee's records with anyone else or allow the documents to be accessed by anyone else.

14.0

The Andersons' relationship with President Clinton and Vice President Gore came to a shocking, sad, and abrupt end.

The Anderson Report's supporting references are:

99.04.393.1158
EST. 66.40.66

14.1 By the time the Andersons received Utrecht's letter, they had read about the false and harshly defamatory statements the CPC made about them in the FEC's Final Audit Report regarding "misstatements" and "itemization" errors only.

The Andersons were very upset but believed that their excellent job in 1992 would speak louder than Utrecht's gratuitous remarks and made by her for unfathomable reasons. The Andersons thought that those issues could be, and would be, resolved. Thus, the Andersons, still unaware they had been used as a scapegoat, submitted an unsolicited proposal to Marsha Scott at the White House, dated February 23, 1995. Refer to Tab 16.

14.2 It wasn't until days later, when the Andersons took time to study the rest of the final audit report, including the large section that had to do with excessive matching funds payments, the last section in the audit report, that the Andersons realized they had been used by the CPC as its scapegoat -- blamed for obtaining 38,000 redesignations that the CPC, itself, had obtained. It was at that point that the Andersons understood that the smears against them at the beginning of the audit report were part of a larger plan and that they had a major problem. Utrecht never contacted the Andersons again. As for Marsha Scott, her requests for proposals and information for the White House to consider for the 1996 reelection also stopped. But information in the February proposal, the final in a series of solicited proposals, was quoted by Utrecht's attorney in legal documents months later.

14.3 The Andersons conclude that, if Scott and Middleton were not in on Utrecht's scheme it shows that the first business the Andersons lost due to Utrecht's false statements was the 1996 Clinton/Gore reelection campaign.

The second business the Andersons lost after Utrecht's false statements were published was the account of Vice President Gore. He had been a client of POC's since 1983 when he first ran for the Senate. POC provided computer, software, and personnel support for his 1988 presidential primary campaign. After his 1990 reelection to the Senate, POC successfully competed to retain his account, undergoing months and months of rigorous scrutiny. Nevertheless, shortly after the Andersons filed suit, Gore pulled his database from POC. (More information in Tab 20, Doc C and E.)

14.4 Letters, memo's, and reprints of articles in Tab 20 reflect POC's overall good standing in the federal election community before Utrecht's false statements.

Speaking generally, to state that a vendor obtained 38,000 of anything without the knowledge of the client is very damaging and would reflect a highly unprofessional image of the vendor. To state that what the vendor obtained was "superfluous" and performed only to increase its fees, adds a degree of unethical behavior and greediness from which it would be very difficult to recover. Add to that damage, another set of defamatory comments that reflect very poorly on the vendor in other areas of its responsibility and the vendor is automatically wiped out. That is exactly what Utrecht and the CPC did to the Andersons and their very fine computer services firm, POC -- wiped them out. Utrecht's false, harsh, and defamatory remarks were repeated by the FEC and appeared in official, truthful looking, audit reports which are distributed throughout the federal election community.

14.5 And thus, the Andersons' relationship with President Clinton and VP Gore, their most famous clients, for whom they did their best work, came to a shocking, sad, and abrupt end.

15.0

Contrary to Utrecht's statements, the Andersons and the CPC enjoyed a very good relationship.

The Anderson Report's supporting references are:

99.04.393.1160

15.1 Pat Anderson made a telephone sales call to the fledgling Clinton campaign at which time she explained POC's experience in matching funds and expenditure tracking and offered POC's services. She received this reply on October 8, 1991, (from Tab 8, Doc A):

Thank you for contacting us regarding your interest in helping Governor Clinton in his presidential campaign.

As the campaign progresses we will need a variety of products and services. As we determine those needs we will keep your offer in mind.

15.2 Weeks later, the CPC called on POC and the Andersons for help. The CPC's original counsel, David Ifshin, wrote on November 13, 1991 (from Tab 8, Doc B):

After an unsuccessful effort to assemble a capacity to do it in-house, POC was finally given the green light to proceed.

[A]s of this hour, we have not submitted to POC the documentation necessary to certify the threshold submission. . . .

15.3 From the moment POC and the Andersons stepped aboard the Clinton bandwagon in November 1991, the Andersons worked hard and enjoyed a warm, professional relationship with everyone on staff at the headquarters in Little Rock. It was exciting and fun. The campaign headquarters staff in Little Rock and POC in Washington pulled together as a "team." Pat Anderson wrote in a memo to the CPC on November 18, 1992 (from Tab 8, Doc C):

I want to thank everyone in Little Rock for their support and cooperation during this past week

After the matching funds' qualifying "threshold" report had been submitted to the FEC, POC staff and the Andersons received flowers with the following note (from Tab 8, Doc E):

Thanks for the good job! You're terrific!
David Wilhelm [campaign manager], Keeley and the Clinton Campaign

15.4 Pat Anderson informed the CPC on December 4, 1991 (from Tab 11, Doc A):

The representative at the FEC, Ray Lisi, told me personally that had the submission not been well organized and easy to deal with (we had put all the documents into three-ring binders and labeled everything well with tabs, etc.) they, the FEC, would not have been able to approve Governor Clinton in time for him to make his first submission on December 2.

Worse than Governor Clinton not being able to make a December submission for matching funds would have been not having his name announced at the same time as the other leading Democratic candidates as having qualified to receive matching funds -- which would have been the case if POC hadn't been able to put the report together in time.

POC's expert and timely work gave Clinton a boost at a critical political juncture. David Ifshin told Pat Anderson at a meeting shortly after Clinton had been qualified by the FEC to receive matching funds: "POC saved Bill Clinton's a--."

15.5 POC and the CPC continued their good relationship as evidenced by the tone and contents of all correspondence (Tab 24) and miscellaneous notes scribbled on working papers, samples of which are shown in Tabs 8 and 10.

15.6 POC was careful, and considered it very important, to follow the rules and regulations of the FEC. POC and the Andersons, on behalf of the Clinton Primary Committee, developed and maintained a good working relationship with the FEC staff. Pat Anderson wrote on November 18, 1992, (from Tab 8, Doc C):

I believe that they [the FEC] are sincerely trying to maintain a helpful stance and as long as we are sensitive and responsive to their needs, the interests of the Clinton Committee will benefit greatly.

15.7 The Andersons developed and maintained a good relationship with the contributors to the Clinton campaign as well. The following excerpt from the November 11, 1991, staff memo is just one example of how the Andersons guided their staff to do a good job for, and be a good reflection on, Governor Clinton and his campaign (from Tab 8, Doc F):

"Procedure to Use in Calling Clinton Contributors"

My name is '[state your] first name'' and I am with the computer company processing Gov. Clinton's presidential contributions. In order to process 'your contribution' I need the

[A]lways say thank you - even if they are rude - never be rude --

15.8 Bill Anderson, in addition to being the overall on-site manager, was directly responsible for personnel, payroll, bookkeeping, billing, equipment, purchasing, facility, communications, monitoring data entry, etc. Pat Anderson was responsible for the contributions data, the "paper" management of the matching funds submissions (including affidavits), printing thank-you letters, and coordinating, with the help of Bill Anderson, the preparation of the monthly compliance reports. A million other details, too numerous to list, were expertly and routinely processed by the POC staff.

15.9 The overall procedure was that the CPC deposited the money in Worthen National Bank in Little Rock and sent photocopies of its contribution checks, along with deposit slips (example in Tab 11, Doc B & C), to POC in Washington via overnight delivery. This system worked very well -- not a single box was ever lost or late. Copies of contribution checks and copies of monthly bank statements comprised the documents routinely sent to POC.

15.10 POC installed a terminal and laser printer with a high speed modem in Little Rock headquarters; this gave the Little Rock staff a direct link to the contributor data on POC's computer. The link was used to "view" contributor records, print reports, and input the expenditure data. Except for copies of the CPC's payroll checks, which POC input, copies of the expenditure checks written by the CPC were never sent to POC.

15.11 Keeley Ardman was in charge of the data entry of the expenditure data from Little Rock. Ardman's supervisor was David Watkins, the CPC's operations manager.

15.12 Pat Anderson worked closely with Ardman and Patty Reilly -- speaking to each of them several times a day. It was from Patty Reilly and Keeley Ardman that Pat Anderson first learned of the CPC's upcoming plans to send redesignation statements -- the project was expected to begin right after POC prepared what would be the last matching funds report, scheduled to be submitted to the FEC on September 1, 1992. (Discussion in Tab 4)

15.13 On September 24, 1992, Pat Anderson was asked to meet with Christine Varney of Hogan and Hartson, CPC counsel between Ifshin and Utrecht, to discuss the upcoming audit and the CPC's plans for filing a complete set of FEC reports, referred to as amendments, that would supplant all previously filed reports with "perfect data." Also at the meeting were Lyn Utrecht, introduced to Pat Anderson as the attorney in charge of the audit; Barbara Yates, CPA from Little Rock who managed the CPC's accounting department; and Keeley Ardman and Patty Reilly. Pat Anderson joined the group after they had finished a private luncheon in the conference room. As Pat Anderson sat down, Christine Varney took a moment to warmly thank Pat and Bill, and their staff at POC, for their very good work throughout the campaign. Everyone at the table nodded their head in agreement. Pat Anderson recalls it was a wonderful day.

16.0

Pat Anderson recalls that the CPC's treatment of POC and the relationship between the Andersons and the CPC changed abruptly.

The Anderson Report's supporting references are:

16.1 Several days after the friendly meeting at which Pat Anderson was warmly praised by Christine Varney, Anderson received a letter from Varney confirming several matters discussed at the meeting. In addition, she asked Pat Anderson for a written explanation of why POC had obtained, what she called, "back dated" redesignation statements, referring to the 76 overlimit redesignation statements that were unusable. Varney also stated that the primary reports must be amended; she stated the CPC staff would work with POC's staff to amend the reports; she emphasized the urgency of completing the amendments and stated they must be completed by October 31, 1992. (Varney letter, Tab 24, Doc Q)

16.2 Pat Anderson was puzzled by the letter. Varney, at that time, was the busiest person in the campaign -- in charge of every legal aspect of both the Clinton primary and the Clinton/Gore '92 general election committees. Why, after giving POC virtually every instruction verbally through Ardman or Reilly throughout the most critical months of the campaign, would she all of a sudden take the time to write a two-page letter confirming relatively mundane things and ask for a written explanation of a minor incident, one that she must have known that Pat Anderson had already discussed with Patty Reilly?

16.3 Varney's letter and its future implications aside, Pat Anderson proceeded to write a memo of explanation about the "back-dated" overlimit redesignation statements. A copy of the memo is in Tab 24, Doc R, and a complete discussion of what an "overlimit" redesignation statement is and what POC obtained that wasn't to the liking of the CPC is in Tab 13.

Briefly, overlimit refers to the portion of an individual's contribution that exceeds the \$1000 legal limit, i.e., over the limit. The FEC refers to the overlimit portion of contributions as "excessives." What matters about the overlimit or excessive portion of the contribution is that the primary CPC may not keep it. The amount over the \$1000 limit must be either refunded or redesignated to the Compliance fund.

16.4 By way of background, POC staff, under the supervision of Pat Anderson, had made a continuous effort to resolve contributions that were over the \$1000 limit and either reattribute the money to another donor (such as a spouse), refund it, or ask the contributor if they would like to redesignate the overlimit portion to the Compliance fund that would soon be established. As each contributor was called, a notation was made on the computer and a record of the conversation was noted on the telephone logs. The Clinton legal department was months slower in establishing the Compliance fund than Pat Anderson expected. All of the contributors who had gone over the limit had been asked verbally by Pat Anderson to redesignate their overlimit amount to the Compliance fund. When the Compliance fund was finally established, Anderson rationalized that perhaps, if the 76 or so contributors affected by the passing of time redesignated their overlimit amount 'as of' the date they went over the limit, the CPC could still use the redesignation for the Compliance fund.

At any rate, Anderson proceeded on her 'as of date' assumption, and using the suggested text supplied by the CPC (Tab 13, Doc B & B.2), and obtained the overlimit redesignations. Anderson assembled them and prepared a computerized listing which was sent to Little Rock.

All of the affidavits were reviewed by the CPC and a total of \$62,365 was transferred from the primary CPC to the Compliance on August 11, 1992, based on Anderson's batch of 169 overlimit redesignations (list in Tab 13, Doc FF). Note, this was the only batch of overlimit redesignations transferred to Compliance that were obtained by POC and/or Pat Anderson.

As things progressed, and Anderson heard no comment about the date, she thought it best to advise Patty Reilly of the date anomaly on 76 of the redesignation statements. Patty Reilly hadn't noticed the dates but after checking on the matter, and came back to Anderson that it wasn't a good idea to use those affidavits -- she stated the dates at that point for those 76 overlimit contributions was outside of the 60 day limit and refunds would have to be made. Patty stated that it might be a good idea to write something to the file just in case there were ever any questions. Pat agreed; but there was no urgency about the memo and, with many other things to do, made a note to write the memo after things calmed down. Since the overlimit contributions were now part of the Compliance fund, it was from that fund that the 76 necessary refunds were made.

Out of 169 overlimit redesignation statements POC obtained, 76 were unusable because of the 'as of' date anomaly. Note: only the overlimit portion of the 76 contributions were refunded, not the entire amount of the contributions.

16.5 It is also worth stating, especially since the CPC, in its false statements, also inferred that POC's incentive in obtaining the 38,000 redesignation statements (actually obtained by Little Rock) was financial, that POC's unit charge for obtaining the 76 overlimit redesignation statements was \$3.50 each. \$266.00 is not exactly a financial incentive for POC considering the time involved to talk to the contributor, generate and mail the affidavit to the contributor, process it upon its return, mark the computer, prepare a list, and talk to Little Rock about them. And that was before they were determined to be unusable. Further, the fact that POC had already lowered its fees once and was about to do it again due to very high volume, when the overlimit transfers were made, confirms it just doesn't make sense that POC would pump up its revenues by all of \$266.00 by deliberately obtaining statements that turned out to be unusable.

16.6 The following are excerpts from Anderson's overlimit memo, full text is in Tab 24, Doc R:

I would like to recount my actions and assumptions regarding POC's management [of the redesignation of overlimit contributions], and, perhaps, it will at least document what and why things happened the way they did.

We have some telephone logs dated as early as March 19, 1992, where we discussed overlimit conditions with the contribut[ors] and the option of getting a refund or redesignating the overlimit amount to the legal and compliance fund that was to be setup.

[W]here the contributor wanted to apply the overlimit amount to the upcoming legal and compliance fund, we noted it and marked the computer.

I told her [Varney] that I thought (correctly) that most everyone we had talked to would return their affidavit redesignating the excess.

I also re-stated in this letter the fact that they could request a refund if they wished; I prepared the redesignation statement with the amount to be redesignated already filled out; I requested the contributor to date the statement as of the date of their last contribution -- this is the date that made them "overlimit" by whatever amount.

It seemed perfectly reasonable to me to do this. All of these people had been talked to before.

In retrospect, I should have sought professional counsel on such factors as dating the redesignations of excessives and the interplay between that and the [date of the] GELAC fund opening. I am sorry that I did not.

16.7 Anderson would state later (July 1993), in a memo to her husband (from Tab 24, Doc Z.2):

I wrote the memo in such a way as to take on as much responsibility for it as possible -- clearly we acted on our own, as we have in so many ways throughout this campaign.

16.8 Several days after the "overlimit" memo was sent to Patty Reilly, another puzzling thing happened. Anderson recalls it was either Patty Reilly or Keeley Ardman that called her with Lyn Utrecht's instructions to send to Utrecht's office in Washington, D. C., all of the telephone logs referred to in Anderson's memo. Of all the things to worry about shortly before the November election, why would Utrecht want possession of telephone logs showing that POC staff had talked to contributors months earlier about the overlimit portion of their contributions?

The logs were significant, however, to Pat Anderson. The logs were the only documents that could clarify and substantiate what Anderson had stated in her "overlimit" memo. The logs also demonstrated that POC staff routinely called and talked to hundreds of contributors about all sorts of things necessary to obtain accurate and up-to-date information so as to make the contributions acceptable and matchable.

16.9 Pat Anderson sent most of the logs but retained for her records a few pages of early logs, as shown in Tab 13, Doc A. The logs were a nice reflection on POC's overall management and Lyn Utrecht never commented on the logs or why she wanted them in her possession.

17.0

The Clinton Primary Committee Used Pat Anderson's Overlimit Memo in U.S. District Court as Proof of POC's "Mistakes."

The Anderson Report's supporting references are:

17.1 Pat Anderson's written explanation about the unusable overlimit redesignation statements was used two years later in legal documents filed in U.S. District Court, Washington, D.C., as 'proof' that POC and the Andersons were making mistakes and that obtaining 38,000 redesignation statements (the CPC had actually obtained) was one of them.

17.2 Add that fact to Lyn Utrecht's action of obtaining from POC, just days after Anderson wrote her explanatory memo, POC's telephone logs, the only documents that could prove that what Anderson stated in her memo was true, it is easy to understand that the Andersons began to view other statements in Varney's letter as unusual.

In other words, Pat Anderson didn't make much of it at the time, but given what has happened, it is Pat's opinion that Varney's letter suggests things that were not a true reflection of what was going on. For example, Varney phrased her statements to sound like the Little Rock staff would help POC clean up its data before filing the amendments, rather than the other way around, which was the necessity and reality of the situation. She pegged the filing deadline for the amendments on October 31, 1992, less than one month away. She must have known the contributions side of the amendments, managed by POC, was the only data that could be ready to go by that date. Yet she made it look as though POC was totally responsible for all the data, including expenditures, thus setting POC up for missing a specified deadline, or worse, being the reason that amendments had to be filed to begin with.

Varney must have known that preparation for filing the expenditure side of the amendments, which Yates and Utrecht managed in Little Rock, would go on for months and months, which it did. Their activity is demonstrated by documents and notes in Tab 8 and 10.

17.3 The other puzzling thing about Christine Varney's letter was that it was void of the spirit of cooperation and goodwill that characterized the meeting ten days earlier. Gone was her tone of appreciation of POC. Surely all of POC's goodwill earned by its hard work and high quality services (and reduction of fees) was not absorbed by one incident where the CPC had to refund portions of 76 contributions that would have had to be refunded anyway. Nevertheless, Varney's letter was copied to no less than four people, including Lyn Utrecht.

To the casual reader, the Varney's letter might not seem the least bit out of line but this letter is the first indication that the CPC was inordinately interested in the overlimit redesignations obtained by POC for purposes other than a simple explanation for the "files." It appears to Pat Anderson that the CPC was already looking ahead to the day when it might have to assert that the Andersons were making mistakes and missing deadlines.

99.04.393.1170

18.0

The 169 overlimit redesignations obtained by POC were in no way connected to the massive project of obtaining the 38,000 redesignation statements Utrecht was referring to in her false statements.

The Anderson Report's supporting references are:

18.1 The overlimit memo, as stated, has been repeated verbatim in legal documents as "proof" that the Andersons obtained the 38,000 redesignation statements as the CPC had falsely stated they did.

It is therefore worth noting that the 169 overlimit redesignation statements that POC obtained were quite different in more ways than sheer numbers from the 38,000 redesignation statements the CPC obtained from Little Rock but falsely stated POC obtained.

18.2 First of all, the 169 overlimit redesignations POC obtained were statements authorizing the transfer of only that portion of the contribution that exceeded the \$1000 limit. The 38,000 redesignation statements the CPC obtained represented a redesignation of the entire amount of a given contribution, the characteristics of which were described on the face of the the redesignation statement.

18.3 Second of all, because an overlimit amount must be either refunded or redesignated, the FEC allows redesignation of the overlimit portions of contributions to occur at any time, even if the CPC is still accepting matching funds and still has debts to pay. This is not the case with the category of redesignations the CPC obtained. The FEC auditors deemed the 38,000 redesignation statements "not permissible" as authorization to transfer the money to the Compliance fund for the reason that the CPC was concurrently requesting matching funds to pay its debts. Only the overlimit portion of excessive contributions may be legally transferred to a Compliance fund while a committee has debts.

18.4 Finally, the 169 overlimit redesignations POC obtained represented a total of \$62,365 of which all but \$34,585 was refunded. The FEC had no questions or objections to the overlimit redesignation statements obtained by POC that represented \$34,585. The CPC, on the other hand, obtained 38,000 signed statements for a grand total of \$2,444,557 and the FEC objected to every single one of them.

It was the FEC's objection to the 38,000 redesignation statements that inspired the CPC to falsely state POC obtained them; the CPC used POC as a scapegoat for obtaining 38,000 "not permissible" redesignation statements and figured out another way to keep the \$2,444,557 in the Compliance fund -- without using the signed redesignation statements.

99.04.393.1172

19.0

For the Andersons, the overlimit memo was quite minor and incident had been forgotten as the November general election neared --

Bill Anderson's memo regarding the relationship of his firm POC and the future needs of President Elect Clinton. His memo reflects a relationship of trust and mutual respect -- a relationship in sharp contrast to the "significant problems" Utrecht claimed existed in the months of June, July, and August 1992.

The Anderson Report's supporting references are:

19.1 Just days before the November election, Pat Anderson received a verbal request from Monica Breedlove, correspondence data manager in Little Rock, to send a copy of the contributor database so it could be merged with other of Clinton's political databases. (Note, this was not a request for the "official" campaign management for transfer of the verified data for contributions or expenditure data -- that didn't occur until December 1993.)

19.2 This request was not puzzling. The Andersons, through the years, have frequently provided complete copies of databases to the client to use in merging with other databases. It did, however, present an opportunity to introduce to the CPC POC's other services, one of which was basic software support for political databases. So, Bill Anderson wrote a letter on October 28, 1992, to David Watkins about how good POC's software was and that it would be an excellent system for keeping a Clinton political database for the future (from Tab 24, Doc S):

Not just for the inauguration, but on into the future,
including 1996.

19.3 The tone and content of Bill Anderson's letter does not reflect any of the "significant problems" that Lyn Utrecht was to state to the FEC auditors was the case with POC during the months of June, July, and August 1992. Bill Anderson's letter reflects no problems because the CPC never had any problems with POC. His letter is clearly not a letter written by someone who has anything to be apologetic about. Rather, the letter has the confident tone of a person secure that his comments will be received as credible because the association between the addressee and the writer has been a credible relationship, with lots of goodwill to call upon. Bill Anderson, at the time, was sincerely concerned about the future needs of a soon-to-be very important client -- one deserving of the very best available (from Tab 24, Doc S):

You will forgive us for telling you that our SESSION
software is the best there is.

Anderson brags about the past strengths of POC's valuable software (which enabled POC to do such a good job of data management for the CPC). He is a vendor advocating the use of software so good that the FEC discovered not a single duplicate record out of more than 200,000 separate contributions submitted for matching. He can also boast that the FEC discovered not a single error where the same contribution was submitted twice for matching. He can boast that not a single affidavit was rejected by the FEC except for one poor-quality photocopy (successfully resubmitted).

He can boast of POC's September 2, 1992, matching funds report to the FEC that was a record-breaking submission for a 30-day period. Included were 64,085 contributors, matching more than 80,000 separate contributions; the report itself was 5,342 pages long and requested a total of \$2,825,181.16 with an acceptable grade of 99.6%. Anderson assumes Watkins would want software that enabled POC to do such a spectacular thing (from Tab 24, Doc S):

This could include, for example, moving this system to Little Rock and selling it together with software, training, support to whomever you choose. With all procedures, such as matching funds, FEC reports, multiple databases, etc. etc.

Anderson writes confidently about POC's software because it has a proven record with David Watkins. Yes, Anderson is proud of the past and hopeful for future, but in the meantime:

Pat and I are planning to come to Little Rock for election night. We hope to have the chance of saying "hi" to you.

With best wishes and continued good luck!
Sincerely, William R. Anderson (from Tab 24, Doc S)

19.4 Bill and Pat Anderson, after casting their presidential votes for Bill Clinton, traveled to Little Rock just to be with the friends they had made during the campaign and share with them the historic event for which they had all worked so hard. Bill and Pat Anderson were terrifically proud; their client of 11 years, Senator Al Gore, would soon be the Vice President of the United States and their fifth presidential client, Bill Clinton, would soon be the President.

19.5 Following the November election and inaugural celebrations, the Andersons and POC staff continued to work closely with Keeley Ardman, Patty Reilly, Laura Shachoy, and the accounting staff supervised by Barbara Yates. The task at hand was to do what was necessary to get every piece of data in the right place -- every penny of money that came in and every penny for which a check was written -- so the amendments could be prepared and filed. Further, Keeley Ardman and Patty reviewed every single expenditure to ensure that their original allocation was attributed to the correct state or fundraising category. It was a massive job for them to review every single thing. Examples of documents generated in this period and discussion of this effort are in Tab 10.

POC decided to produce spread sheets that would reflect the correct data and greatly aid in the preparation of the amendments. To make sure each spread sheet was correct, POC came up with its own version of bank reconciliations, that is, identifying and categorizing each entry. This was useful in helping the CPC's expenditure clean-up as well. POC was able to identify what the CPC had entered as voided checks but had cleared the bank as paid. POC identified the reverse condition as well (checks marked as outstanding that had really been voided). Everyone worked together.

Contrary to other of Utrecht's statements to the FEC, the CPC never gave POC or Pat Anderson a balancing figure of any sort to put on the FEC reports. NEVER.

20.0

POC begins its "reconciliation" project.

The Anderson Report's supporting references are:

20.1 Shortly after the election, and as part of the general review of data and getting things in order, the Andersons began a project that became known as the data "reconciliation" project. A complete discussion of this project is in Tab 14.

20.2 Briefly, the CPC, having requested 55,000 of its contributors to sign a redesignation form, received approximately 38,000 signed requests in its offices in Little Rock. Processing the signed redesignation statements was managed in Little Rock by Allen Wegehoft with the oversight of Barbara Yates. The redesignation statements were assembled into batches and the sum of the statements in a batch was the amount transferred from the primary to the Compliance fund. Further, the Compliance fund established a database of the redesignated contributions by entering the data on the face of each statement (contributor's name, address, and contribution amount, deposit date, check number, etc.) into its computer -- all done in Little Rock.

20.3 The redesignated contributions were originally primary campaign contributions and as such were already on POC's computer in Washington, D.C. The problem now existed that the same, identical contribution was on two computers at once. This posed an FEC compliance problem, as the same contribution cannot be attributed simultaneously to two different committees. This posed a record keeping problem, as Pat Anderson pointed out in a letter to David Watkins on September 10, 1992. She stated the problem and offered a solution (from Tab 14, Doc A):

Next, regarding the results of the effort to reattribute contributions to the general election compliance fund. We suggest that the records of those accepting this option be noted appropriately so that the Committee will have complete contributor data in one central file. We will do this for a very low cost if provided a list or tape of the contributions being shifted. In addition to the importance of complete individual data for [FEC] compliance reasons, the file could be readily useful in case it is unexpectedly necessary to submit additional matching funds requests.

In other words, Pat Anderson advised the CPC to let POC know which primary contributions were being "shifted" to the Compliance fund so POC could code its computer records to reflect which specific contributions had been "shifted" from the primary to the Compliance fund. In other words, 'reconcile' the data on the two computers.

20.4 The CPC followed Pat Anderson's advice. As documentation for the CPC's first "batch" transfer on September 30, 1992, the CPC sent POC a copy of the entire batch of redesignation statements (shown in Tab 6 of the Complaint). POC staff summarily went through the batch, calling up on its computer the name on each signed statement. POC staff then entered a one-character code on the POC computer next to the contribution that strictly corresponded with the contribution on the face of the redesignation statement. Thus, POC identified on its computer the contributions Little Rock had "shifted" to the Compliance fund.

After the CPC's initial transfer on September 30, 1992, Allen Wegehoft's group no longer sent to POC copies of the actual redesignation statements. Rather, Little Rock sent to POC computerized lists of the redesignated contributions, transfer by transfer, i.e., batch by batch. POC used the Compliance fund's computerized lists in the same manner as the signed statements, that is, to mark the original primary contribution record as being shifted to the Compliance fund.

The final result was that the Compliance fund's data was "reconciled" with the POC data. Per her request, Lyn Utrecht was sent a set of the reconciled data report in May 1993. The Andersons currently have in their possession the other two sets of the reconciled data.

20.5 The first and last page of each computerized report which lists the redesignated contributions by batch, prepared and sent to POC by Little Rock Compliance fund staff, are contained in Tab 14. A summary of each transfer and the reconciliation results are provided in Tab 14, Doc C. A report from the POC computer which shows the codes used for the batches shifted is in Tab 14, Doc B.

20.6 The CPC and Utrecht, in their legal response to the Andersons' libel suit stated the reconciliation project was proof that POC obtained 38,000 redesignation statements.

20.7 The Andersons don't understand how anyone could reach the conclusion that the data reconciliation project is proof that POC obtained the redesignation statements. In fact, it is surprising that the CPC's libel attorney even mentioned the reconciliation project. Of all the documents in the Anderson Report, the reconciliation documents, reflecting the Compliance funds' own data entry of the data on the face of the redesignation statements is proof, indeed, that the CPC obtained the redesignation statements for which they blamed the Andersons. The fact that there is a strict correlation between the Compliance fund's computerized lists and the 15 transfers as shown on bank statements, reinforces the fact that the CPC itself made 15 transfers of money based on batches of redesignation statements.

21.0

As the audit progressed, the CPC's unusual treatment of POC continued -- POC was kept strictly away from the FEC auditors.

The Anderson Report's supporting references are:

21.1 As stated, POC had been given instructions in Varney's October 3, 1992, letter not to talk to anyone at the FEC; all communications had to be through the CPC:

. . . [A]ll contact with the Federal Election Commission will be exclusively with the campaign.

(from Tab 24, Doc Q)

21.2 During the early part of the audit, the FEC needed to ask Pat Anderson a technical question. Rather than talk directly to the FEC's technicians as she had so many times during the campaign, Anderson now was instructed to go to the law office of Lyn Utrecht and, as Utrecht listened on the speaker phone, the FEC staff person asked the questions of Pat Anderson which she then answered. The "speaker phone" conversations were the only contacts Pat Anderson, or anyone at POC, had with the FEC during the entire Clinton for President audit.

21.3 In late 1992 and spring of 1993, the CPC, without warning or questioning POC about any invoices, began to be extremely slow and spastic about paying same. Bill Anderson, as shown in Tab 24, Doc T, V, and X, wrote several letters about getting paid. The CPC thus far had never questioned POC about its meticulously detailed invoices. And now, the CPC did not offer any explanation or apology for the delay in payment of invoices. Since the CPC literally had millions in the bank and very few outstanding invoices, it didn't make any sense for POC to have to call or write the CPC about getting paid as shown by the following:

I hate to be a bother but we are looking at a bunch of taxes.
. . . [E]nclosed is a statement of outstanding invoices.

(February 17, 1993, from Tab 24, Doc T)

Our account with the CPC has unpaid invoices for work done three months ago. (June 7, 1993, from Tab 24, Doc V)

If you could favor us with another payment within the next few days we would surely appreciate it. (June 15, 1993, from Tab 24, Doc X)

21.4 Finally, as the payment problem became too critical that POC's ability to make its payroll was threatened, Bill Anderson advised the CPC:

This is to inform you that we are discontinuing our services to the Clinton for President Committee due to non-payment of invoices. (July 1, 1993, from Tab 24, Doc Y)

21.5 The next day POC received payment for its services through April 30, 1993. Anderson wrote another letter asking the CPC to uphold its agreement to pay POC in a timely manner (from Tab 24, Doc Z):

Thus, our request for timely payment of our invoices can be summed up as a request that the Committee pay in accordance with the schedule the Committee, itself, stipulated.

(July 2, 1993, from Tab 24, Doc Z)

21.6 A day or so after POC received partial payment for amounts long overdue, Lyn Utrecht telephoned Bill Anderson and asked him to write a letter of explanation regarding four instances where Utrecht thought there could have been charges to the CPC for POC's errors; Utrecht stated to Anderson that she was also going to call Keeley Ardman in Little Rock and ask her about any POC errors of which Ardman was aware.

Note: Utrecht's questions did not relate to the audit and she did not mention the audit or auditors to Bill Anderson. She asked POC to write a memo about errors where there "could" have been "charges" to the CPC.

Bill Anderson asked his wife Pat to address the details of each of the issues Utrecht asked him about so he could, in turn, answer Utrecht's request for a written explanation. A copy of the memo that Pat Anderson wrote to her husband on July 9, 1993, addressing each of Utrecht's specific issues is included in the Anderson Report, Tab 24, Doc Z.2. A complete discussion of the Overlimit Issue is in Tab 13. Excerpts from Pat Anderson's memo to her husband, individually addressing each issue, are shown below:

21.7 Pat Anderson stated the following about the "Issue Regarding "back-dated" affidavits" in her July 9, 1993, memo to Bill Anderson (from Tab 24, Doc Z.2):

I wrote the [overlimit] memo [Tab 24, Doc R], dated October 6, 1992] in such a way as to take on as much responsibility for it [obtaining 76 unusable overlimit redesignation affidavits] as possible -- clearly we acted on our own, as we have in so many ways throughout this campaign.

I would say that I had every reason to believe that the management of the affidavits was correct because we did not ask the contributor to back date anything, we referred to the date as the "as of date" because it was the date that the overlimit contribution was made.

I had been told several months earlier by Phil Friedman that the [Compliance] fund was "in the works" -- that's the only reason we continued to call people about the upcoming fund and asked them to date their affidavit as of the date the offending [portion of their] contribution was made.

21.8 In the same memo, Pat Anderson stated the following "Regarding July 1992 Report Overstated by \$200,000:"

Looking back at the figures in our working papers and the spread sheets (which were correct), we believe the error must have been a typographical error that was not caught at the time.

We regret the typo but do not charge extra for them. As for the extra work relating to that error, there was very little "extra" work on the part of anyone to resolve that error inasmuch as every single FEC report and schedule were reviewed in the same manner by the Arkansas staff; we might add that with one or two exceptions, all reports balanced exactly or within a tiny (pennies) amount. We are very proud of that record given the fact that we NEVER had a balancing figure from the accounting department against which to balance,. NEVER. (from Tab 24, Doc Z.2)

21.9 In the same memo, Pat Anderson stated the following on "Error Regarding Payments to Worthen National Bank" (from Tab 24, Doc Z.2):

The only thing I can think of is the situation where the Committee, during the early, start-up days, wrote several checks to themselves and deposited them into the payroll account (rather than transfer money to the payroll account by an interaccount transfer). By the time we became involved with the Committee, I believe the practice had been discontinued. When I saw this prior activity, I realized, as did they, that care had to be taken on the 4th QTR 1991 report so that expenditures would not be overstated.

As a result, the FEC report itself was correct -- expenditures were not overstated -- I allowed for the unusual management. What we failed to do was simply make those entries on the Schedule a "memo" type entry. As I recall, no one noticed it until the FEC, seeing the obvious, reminded the Committee of the proper way to make a memo entry on Schedule B.

Certainly, no charge was made for something we failed to do.

Restated, POC put the right information on the reports, the only "error" was failing to type the words "MEMO ENTRY" in the correct place on the accompanying schedule. POC's only involvement was trying to clarify to the FEC the CPC's unusual procedure of writing a check, rather than making an interaccount transfer to put money in its payroll account.

POC's "failure" occurred, it is remembered, on the first report POC prepared for the CPC -- the 4th quarter 1991 FEC report filed on January 31, 1991. To include this sort of thing, an omission of the words "memo entry" on a schedule that was filed over 18 months earlier, as one of four of POC's overall errors for which Utrecht required an explanation, demonstrates just how desperate the CPC was to come up with any "errors" on POC's part.

Lyn Utrecht tried to turn this very simple clerical error -- of absolutely no consequence to anyone -- into a big deal by referring to it as "payments to Worthen National Bank."

21.10 Anderson addresses in the same memo (from Tab 24, Doc Z.2) Utrecht's comments regarding the "Issue of audit tapes for the FEC - Was the CPC charged twice?

The Committee was charged only for production of the tapes that should have been sent to the FEC; at no time has the [C]ommittee ever been charged twice for production of any product where only one set was requested. POC invoices would bear this out.

On occasion, magnetic tapes produced by POC could not be read by the recipient computer. Perhaps the tape was correct but the accompanying file layout didn't match; perhaps it was the other way around. Often, the first time a new format is used, things don't go perfectly, as magnetic media transfers require. One character off and everything else is wrecked.

In the history of POC, indeed the history of those in the computer business generating magnetic media, mismatches between file layout and magnetic media format occur frequently, especially the first time a new format is used. Any problems are usually quickly remedied and, if another tape production is necessary, certainly it is always done at NO COST to the client.

POC prepared approximately 75 tapes containing Clinton data between 1991 and 1993; about half of these were sent to the FEC. The balance of the tapes were sent to various direct mail companies, or Clinton satellite campaign offices across the country. It happens that 6 or 8 tapes were sent to Schuh Advertising in Little Rock during September 1992, as instructed by David Watkins. These tapes contained the contributor and contribution data for which the CPC was soliciting redesignation statements.

Pat Anderson recalls two occasions when the FEC couldn't read the magnetic media. The first, when POC prepared the initial set of magnetic media containing the threshold matching funds submission data according to the FEC's specifications, the FEC couldn't read the tape the first time around. They asked POC to resubmit the media, which POC did immediately, and everything went smoothly for the 12 or so matching funds tapes thereafter. The second occasion occurred more than a year later at the beginning of the audit, when it is recalled that the first set of POC's tapes contained too many "null" spaces or the like. A programmer was called in and the problem was fixed very quickly. All subsequent audit tapes were correct.

Pat Anderson also recalls that Schuh Advertising couldn't read the first tape POC sent to it; but quickly the problem was corrected and the subsequent 6-8 tapes were perfect. Again, no charge was ever made for redoing or clarifying a tape.

Part of POC's responsibility was to accommodate data transfers as requested or required by the CPC or the FEC; each request was fulfilled in a timely manner, the data on the tapes was always correct, and it was only on initial transfers when a different format structure was required that, on three occasions out of 75, POC didn't get it perfectly right the first time. Again, for Utrecht to refer to this kind of thing as "errors," and asking POC to write a written explanation, once again demonstrates how deperate Utrecht was to itemize anything that wasn't perfect as a "POC error."

21.11 Pat Anderson states, in the same memo regarding charges for "errors" in general:

[I am] not aware of any "errors" committed by POC. It must be obvious from our record that every effort was made (1) to determine the correct way to handle the data in the reporting area; (2) to ensure proper controls and management of the data; and, (3) initiate and design programs and procedures that would simplify management but ensure accuracy of the data -- time and time again, month after month.

POC information is regarded as the source of balancing data rather than the accounting department. With, we believe, one exception, out of over \$35 million dollars of transactions, our spread sheets were perfectly accurate and kept the accounting department in line rather than the other way around, over and over again.

[I]n other words, the leadership we have continually demonstrated, the reliability of the data we were responsible for (for which we had no source documents), and the timeliness of delivery of reports to the FEC and support materials to the Committee (under extremely heavy volume), is a record for which we are ENORMOUSLY PROUD.

We are sorry [they] find it necessary to solicit our guarantee that the Committee has not been charged for our "errors." But, nevertheless, we are happy to state, unequivocally, that the Clinton for President Committee has not been charged for errors and that, in fact, per item of data, number of documents managed, and products delivered, not to mention reliability, we would venture that the Committee has received the best value for services performed of any of the service providers to that Committee, past or present.

21.12 Later that same day, Pat Anderson wrote another memo to her husband regarding "Charges and credits to the Clinton for President Committee (from Tab 24, Doc Z.3):

I have written a memo [Tab 24, Doc Z.2] to you about the 4 issues that Lyn Utrecht raised about POC's errors during the campaign and whether or not the campaign has been charged for the time it took to "commit" these errors.

You mentioned that you must submit a response to Lyn about these issues and, if appropriate, deduct from the outstanding invoiced amount due to POC, the amount charged for services in the commission of these errors. Where they had not been unduly charged, we were to so verify, affidavit style, in a letter to her.

Certainly it has been the policy of this company to always answer the questions of a customer about issues regarding the bill. I cheerfully respect that inquiry in this instance, even though it wasn't made until after we had to abate services to the Committee for non-payment of invoices.

I believe, however, before we respond, we should understand exactly the questions because several of the references were vague and I honestly don't know exactly what she is referring to.

I am so proud of our record of service to the Committee, indeed Lyn even said she thought we had done a good job. I would be happy to explain, give details, and provide any information but I think it important to know what the questions are and the perceived "errors" are.

Also, I think it appropriate that the Committee apply the same standards of excellence of all their vendors and service providers. You told me that Lyn asked me to try and think of any "errors" we made; she also mentioned that she would ask Keeley if Keeley could think of anything POC had done wrong and so forth.

I believe the Committee would be wise to have a stated policy about "errors" and a clear definition of an error. Also, guidelines for a vendor and service provider to adhere to when charging to the Committee any "time" that it took to "commit" these errors and the time charged it took to clean up the errors, etc.

21.13 Being asked about "errors" and whether or not the CPC was charged for them, so upset Pat Anderson that she also stated to her husband she thought POC should consider rescinding their courteous and generous fee reductions (from Tab 24, Doc Z.3):

As you recall, there have been numerous and generous rebates that POC has made to the Clinton for President Committee, the extent of which, perhaps, Lyn Utrecht is unaware.

I looked up in our files the two letters that you wrote [but signed by Pat Anderson] to David Watkins regarding these rebates. I believe that these should be carefully looked at by the attorney of the Committee to make sure that these do not constitute an unusual or illegal action on our part because, unless the Committee allowed or required such rebates, as a stated and consistent policy, from all vendors and service-providers, it will look like a contribution in-kind from a corporation and, we all know, that is not allowed.

22.0

Statistically speaking, POC was 99.4% perfect -- certified by the FEC.

The Anderson Report's supporting references are:

22.1 Looking at errors scientifically, POC's "error" rate, as determined by the FEC, for matching funds submissions averaged less than 6/10 of one percent. That means that 99.4% of POC's work was deemed perfect by the FEC. The evidence and documents presented in this Complaint show that POC had procedures, was innovative, kept good documentation, etc., etc., and was otherwise excellent in all areas of its responsibilities (samples and discussion concentrated in Tabs 8 and 10).

If statistical sampling has any value in determining overall quality -- and it must if the FEC uses the technique -- it can be scientifically extrapolated that POC performed all its duties 99.4% correctly.

22.2 Even though POC strived to be perfect; could it be that Utrecht was complaining that POC was only 99.4% perfect? When it came to other vendors, however Lyn Utrecht was forgiving, understanding, and chastised the FEC auditors for being unreasonable. The following is from the CPC's Interim Audit Response, a copy of the page containing the following passage is in Tab 23, Doc A, page 8:

. . . [T]he vendors inadvertently made bookkeeping errors in the billing process.

Inadvertent bookkeeping errors are unavoidable in the operation of any business and, therefore, are within the normal and ordinary course of business.

Most importantly, the vendors and Committee rectified these errors as soon as discovered. To penalize vendors and the Committee where inadvertent mistakes were made and immediately rectified upon discovery would seriously undermine the Commission's mission to encourage voluntary compliance. In fact, it would discourage parties from rectifying innocent errors.

22.3 The Andersons experience is that a presidential primary campaign is similar to a startup business -- except that campaigns start suddenly and disappear almost as quickly. Usually, only a few have any experience for the precise job they are doing. It is an enterprise where every day, for 12 months, there are new deadlines and challenges; schedules are almost useless as work flow oscillates from doing nothing to doing everything; where 32,000 checks are written for more than \$40,000,000 in services, all spent in less than a year; where two major reports are due every month for 12 months, each of which is eagerly scrutinized by the press; where about 230,000 individual contributors must be thanked for giving some \$25,000,000, of which about 200,000 contributions are matched for \$12,000,000 in federal money and 9,197 of which need an additional signature on an appropriately filled out affidavit in order to make \$1,477,506 matchable; where more than 1,000,000 photocopies of check copies and affidavits obtained by POC are appropriately managed and catalogued; where not one single duplicate record was uncovered by the FEC; where not one single contribution was submitted twice for matching; where not one single affidavit of the 9,197 was rejected; where not a single contribution check copy was missing; all while contribution volume exploded from 12,000 in June 1992 to 80,000 in July 1992.

The excellent record the Andersons achieved is quite amazing and very extraordinary. The Andersons are very proud of their record.

Utrecht extracted written statements from the Andersons about extremely minor imperfections in their services -- the 0.6% that kept the Andersons from being absolutely perfect. Looking closely at the 0.6% imperfection, it can be determined that it didn't cost the CPC any money, certainly not when it is considered that POC voluntarily lowered its fees to the CPC by more than \$130,000 on its own initiative.

22.4 Nevertheless, on July 9, 1993, Bill Anderson complied with Utrecht's demand to have a written explanation, trying to point out that POC had been a "team" player by extending credit to the CPC of nearly \$200,000 at one time and by reducing its fees which saved the CPC \$104,178. (Discussion of POC reducing its fees in Tab 5.) Anderson stated (from Tab 24, Doc AA):

Obviously, the amount . . . above is thousands of times more than enough to offset the four instances in which you felt there COULD have been charges for mistakes made on our part. Nevertheless, I will briefly address these four points and should you need further detail I will be glad to provide same.

Anderson ended his two-page letter about POC's errors by stating:

Trusting that the above will answer your questions, we look forward to receiving the Committee's check for services through June 15, 1993 in the amount of \$26,372.90. Upon receipt of same or word from you that it is enroute we will commence the final work toward the July 15th [1993] FEC [quarterly] report.

Anderson adds in a footnote:

P.S. I am enclosing a copy of our July 22 and September 10, 1992 letters to David Watkins. You may not have these; they provide additional detail on our voluntary price reductions. They may also demonstrate the flavor of our efforts to be a team player to the Committee.

23.0

Given what has transpired, the Andersons are grateful to Lyn Utrecht for giving Bill Anderson an opportunity to respond in writing about POC's four errors.

The Anderson Report's supporting references are:

23.1 Utrecht's verbal request for an explanation about POC's four errors occurred between July 2 (date of Anderson's letter requesting assurance overdue invoices would be paid) and July 9, 1993 (date of Anderson's written reply to Utrecht's telephone call). Between those two dates, Utrecht was very specific about only four "errors" POC had committed for which she wanted an explanation. She was obviously satisfied that it was only four (so-called) errors that POC and the Andersons had "committed." Otherwise, the CPC would have continued to withhold payment of POC's invoices until the CPC received satisfactory explanations.

23.2 With that in mind, it can be stated that as of July 9, 1993, POC's record was nearly perfect -- 99.4% certified by the FEC and now also confirmed by Utrecht's own itemization of POC's errors -- she could think of only four things out of millions of operations performed by POC for the CPC -- where POC made "errors."

23.3 If Pat Anderson's overlimit memo dated October 6, 1992, and POC's reconciliation project completed in May 1993, in fact "proved" (as Utrecht's lawyer later contended) that POC inexpertly obtained redesignation statements that were "superfluous" to the CPC's needs, i.e., unnecessary, then it would stand to reason that, Utrecht would have also demanded that the Andersons address such a huge "mistake."

23.4 Further, if she would withhold payment from the Andersons until they addressed four minor flaws in all of POC's services, it would stand to reason that she would have "raised the roof" about what she later claimed to the FEC was POC's very gross and inexpert action. By any measure, an inexpert action of that massive a proportion -- postage alone would have cost \$30,000 -- would have warranted a letter from the CPC to POC.

But Utrecht never asked Bill Anderson about seeking and obtaining the redesignation statements and the CPC never sent a letter to the Andersons complaining about them because Utrecht must have known that the CPC, not the Andersons and POC, was solely responsible for seeking and obtaining the redesignation statements.

23.5 Utrecht's ploy to gather 'admissions' from the Andersons to use against them later if the need should arise, actually serves to confirm that the Andersons' record of service to the CPC was nearly perfect. It confirms that Utrecht could only "reach" the sum total of four "errors" that the CPC thought POC might have charged the CPC for. Utrecht's request for an explanation and the Andersons' response also serves to prove that they did not obtain the 38,000 redesignation statements supposedly by "mistake," as Utrecht claimed, otherwise Utrecht would have asked the Andersons to address a sum total of FIVE errors.

23.6 If the CPC was so "distressed," as Varney stated, by POC obtaining 76 unusable overlimit redesignation statements -- where is its outrage expressed for POC supposedly obtaining 38,000 "not permissible" redesignation statements without the CPC's knowledge? There was no outrage because the CPC, not the Andersons, obtained the 38,000 redesignation statements thinking, at the time, the statements would serve as legal authorization for transferring the \$2.4 million. It wasn't until the CPC had to disassociate itself from the redesignation statements did the responsibility shift to POC.

24.0

The Andersons realized that suing a client, especially one that is also the President of the United States, is a major step.

The Andersons tried first to resolve the matter privately.

The Anderson Report's supporting references are:

24.1 **March 24, 1995 -- Bill Anderson's letter to White House General Counsel Abner Mikva.**

Bill Anderson, having served in the U.S. House of Representatives with Abner Mikva, who at the time was the White House General Counsel, wrote a letter to Judge Mikva which briefly outlined the false statements that had been made by the Clinton for President Committee about Anderson's database management company (from Tab 15, Doc A and enclosures):

I have been very reluctant to contact you about the matter at hand but finally decided to do so, realizing that a low key, confidential meeting with you could be the best chance of avoiding any course of action that could be damaging to the President.

In sum, our company has been badly damaged and libeled by these gratuitous statements. This presents us with one of the most perplexing dilemmas we have ever had to face.

24.2 Anderson included a brief history of his firm and included two pages of the defamatory statements quoted from the FEC Final Audit Report. Judge Mikva never responded to Anderson's letter.

25.0

The Andersons tried a second time to resolve the matter privately.

The Anderson Report's supporting references are:

25.1 June 16, 1995 -- Letter advising Lyn Utrecht, Barbara Yates, and Clinton for President Committee that the Andersons planned to file a libel claim.

25.2 The letter recounts the problem and, among other things, states (from Tab 15, Doc B):

The numerous, libelous statements made by the Committee were presented to the FEC as facts although they were totally false and gratuitous.

The false, damaging comments were reinforced over and over again as the FEC staff pondered and prepared the audit information for the Commissioners and the public. When the Committee wrote of 'the vendor who processed the contributions' and 'who failed to reconcile her records' it was abundantly clear that the references were to POC and Patricia Anderson, respectively.

The FEC's subsequent republication of the libelous statements as facts in separate, official FEC audit reports covering the three committees directly responsible for the election of the President and Vice President of the United States had the effect of giving the weight of truth to the false, gratuitous statements.

Indeed, after reading other, unrelated audit reports, I cannot find a single instance where vendors for a presidential primary campaign have received any criticism at all, much less powerful, defamatory statements that impute lack of skills and integrity as the false statements about POC and the Andersons so powerfully asserted.

I speculate that the reason for the false statements had a lot to do with the obvious attempt of the Committee to disassociate itself from the necessity of obtaining from the contributor authorization to transfer his contribution from the primary account to the GELAC account. The only way to do that was to blame POC for obtaining the redesignations without the knowledge of the Committee.

My clients are not out to hurt anyone, directly or tangentially, particularly President Clinton.

Accordingly, if you are interested in pursuing settlement, we would be willing to meet with you or otherwise discuss the matter.

You should be advised, however, that it is our intention to file suit . . . if there is no response to this letter before June 30, 1995.

26.0

Utrecht responds to the Andersons' letter of June 16 with hubris, arrogance, threats, and more false information.

Without regard to the impact such a stance would have on President Clinton, Utrecht claimed "absolute privilege" to submit "actual defamatory matter" to the FEC.

The Anderson Report's supporting references are:

26.1 June 29, 1995 -- Utrecht and CPC responded to Andersons' June 16 letter.

In it, John Keeney, attorney for Utrecht and CPC, stated that the document in which the statements about the Andersons and their firm POC first appeared, CPC's Interim Audit Response, was preliminary to a proposed judicial proceeding and therefore privileged and protected from the Andersons' libel charges (from Tab 15, Doc C):

There is absolute privilege for attorneys, parties, and witnesses to publish any matter (including alleged or actual defamatory matter) in 'communications preliminary to a proposed judicial proceeding.'

All statements in the Committee's July 6, 1994 response to the FEC Interim Audit Report were preliminary to a proposed judicial proceeding under 26 U.S.C. Section 9040, and therefore are absolutely privileged under the Restatement as adopted in the District of Columbia.

26.2 Utrecht and CPC stated the Response was also protected by privilege because it was information furnished to a federal agency:

An independent absolute privilege also exists with respect to information furnished to a federal agency concerning matters within its jurisdiction.

26.3 Utrecht and CPC stated the Response also had a third privilege:

[T]he controlling District of Columbia law recognizes an absolute privilege with respect to submissions in the District of Columbia by an attorney in the District of Columbia to an agency located in the District of Columbia. . . .

26.4 Utrecht and CPC claimed neither Andersons nor POC are mentioned by name, therefore the statements are not libelous.

26.5 Utrecht and CPC claimed officers of a corporation cannot be personally defamed, therefore the statements are not libelous.

26.6 Utrecht and CPC claimed the 'failed to reconcile her records' comment was true, therefore not libelous, stating the FEC used the word 'misstatement' and POC was responsible for the report in which the misstatements were made, therefore the statement was true, a defense of libel.

26.7 Utrecht and CPC claimed the 'significant difficulties' comment was true, and also a statement of opinion and therefore not libelous.

26.8 Utrecht and CPC claimed POC admitted obtaining the redesignation statements and therefore the Response was true, 'admitted to' by POC, and not libelous; it is an 'opinion' as to whether the redesignation statements should have been obtained and opinions are not libelous; as to the statements the 'Committee staff' did not see these contributions until after the election, inferring that the redesignation statements were obtained without the knowledge of the CPC staff, Utrecht and the CPC claim that statement does not refer to a vendor and therefore not libelous.

Keeney, of course, did not address the fact that the false statements appeared together in one paragraph and, together, the meaning of the phrases profoundly influenced the decision of FEC auditors and the final Commissioners' vote. The FEC Commissioners and the FEC general counsel are on record as understanding that the 38,000 redesignation statements were obtained "by mistake by a former vendor." From FEC General Counsel Legal Opinion, FEC Final Audit Report, Tab 28, bottom page 158:

The Primary Committee contends that the redesignation statements were performed by mistake by a former vendor.

The FEC auditors had stated their understanding of Utrecht's false statements in the Commission's open meeting in December 19 Final Audit Report (from Tab 28, bottom page 87) thusly

The Committee states that the redesignations were obtained by the vendor who [sic] processed contributions for the Committee without the Committee's knowledge. The explanation suggests that due to provisions in that vendor's contract, the vendor stood to gain by sending the redesignation requests.

Finally, but certainly not least, the true origin and responsibility for the redesignations was discussed at the Commissioners' open meeting on December 14, 1994; the "information" that the CPC's computer vendor obtained the redesignation statements without the knowledge of the CPC was a key issue. The following excerpts are from the FEC Open Meeting Transcript, full text in Tab 27:

Joe Stoltz of the FEC Audit Division states on page 34 of the transcript:

. . . and that therefore, the redesignations were unnecessary to transfer these amounts, and were a mix-up of some sort with the Committee's computer vendor and should not have been requested.

Democratic Commissioner Thomas states on page 56 of the transcript:

Their vendor went so far as to cover themselves and get what they were calling redesignations.

FEC General Counsel Lawrence Noble states on page 90 of the transcript:

Yes, but if seeking of a redesignation is to mean anything, and the Committee claims it was a mistake, but if it is not looked at as a mistake, then what it shows is that they [the Primary Committee] first recognized these as primary contributions, then as Commissioner Aikens said, the regulation comes into play and says that they cannot redesignate these as long as they had debt.

Democratic Commissioner McGarry states on page 90 of the transcript:

I think even if it was wrong to get the redesignations. . . .

Joe Stoltz states on page 92 of the transcript:

They are, assuming that the redesignation was permissible, however, if it is assumed they were primary [contributions] to begin with and required a redesignation, then I think 9003.3 comes into play, and the redesignation [transfers of money] wouldn't have been permissible to start with.

Keeney's letter referred to two "proofs" of admission from the Andersons that their company obtained the redesignation statements. Both of these "proofs" are red herrings. One "proof" consisted of a comment by POC in its last proposal to the White House (February 23, 1995) in which POC took credit for 'reconcil[ing] 30,000 + contributions redesignated to GELAC'. The other "proof" of admission was Pat Anderson's overlimit redesignation memo (October 6, 1992); note that Keeney reprinted the entire text of the "overlimit" memo and that the memo did not in any way refer to other than "overlimit" redesignation statements (which numbered 169) and which the FEC considered legal. The Andersons discuss these "proofs" in the Anderson Report (reconciliation project, Tab 14; overlimit project, Tab 13) and each is addressed in legal filings by the Andersons' attorney (full texts in Tab 15 and also discussed below). The CPC has no proof the Andersons obtained the redesignation statements because the CPC, not the Andersons, obtained the redesignation statements.

26.9 Utrecht and CPC claimed the comment about POC's financial 'incentive' to obtain the redesignation statements was true and as proof, reprinted sections of POC's contract which referred to POC's units prices and incentive if a matching funds grade of between 98% and 100% was achieved. Note that POC's financial incentive pertained to matching funds; the overlimit redesignation statements were not submitted for matching funds.

26.10 Utrecht and the CPC claimed the comment "totally superfluous 'redesignations' sought and obtained by the CPC's vendor" was true and admitted to by POC, again referring to the February 23, 1995, proposal comment "reconciled 30,000+ contributions redesignated to GELAC"; Keeney's letter notes that Geltner is wrong in stating that POC had nothing to do with the redesignations, as this is clearly contradicted by POC's "admission."

Note that Utrecht and the CPC are attempting to equate obtaining redesignation statements with reconciling (after the fact) the redesignation data entered on the Compliance fund's computer with the original primary contribution data used to generate the "Schuh tapes" on POC's computer. The attempt fails because the Compliance Fund in Little Rock entered the redesignation data (based on the returned redesignation statements) and then sent computerized lists of the redesignation data to POC to use in marking its computer with a code that identified the date the primary contribution was transferred to the Compliance Fund. The reconciliation, which was necessary for FEC compliance reasons, proved that the CPC made transfers to the Compliance Fund based on redesignation statements and it also proves that the Compliance fund entered this information in its computer before sending it to POC to reconcile with the original primary contribution on its computer.

26.11 Utrecht and the CPC claimed the comment "and the relationship terminated..." referring to the Andersons' objection to being publicly fired, was also protected by privilege because it was submitted in response to information requested by the auditors; it was also stated that POC's contract had expired and also fell into the category of opinion, and therefore not actionable.

The fact that the FEC had been notified that the CPC's relationship with POC would be terminated during the year prior to the Andersons being notified is not the normal way of doing things. The CPC clearly wanted the FEC to think POC's performance was unacceptable and that the CPC wanted nothing more to do with POC after the audit. POC was not advised until one year later the relationship would be terminated.

This is contrary to what the Andersons were told by two White House aides who began to solicit proposals from the Andersons in the fall of 1994 regarding preparations for a 1996 campaign. Fall 1994 was a critical period for the CPC. The issue is fully discussed in Tab 16 and Sections 13.0 and 14.0 of this discussion.

26.12 Utrecht and the CPC claimed that the statement:

"The Primary Committee contends that the redesignations were performed by mistake by a former vendor."

was not made by Utrecht or the CPC but by the FEC General Counsel and therefore is no cause for action. What this statement shows, however, is that the FEC took Utrecht's false statements to mean exactly as she intended.

26.13 Utrecht and the CPC concluded:

With respect to any litigation filed by you on behalf of POC or anyone else contesting privileged and true phrases from the July 6, 1994 FEC filing, we will seek Rule 11 sanctions against you and any plaintiff. The D.C. Circuit has recently upheld Rule 11 sanctions of \$149,000 in similarly frivolous libel litigation. We will also file a counterclaim for indemnification of the hundreds of thousands of dollars in actual costs to correct FEC-claimed errors and in potential penalties that the FEC is currently considering for

FEC-claimed errors in the FEC filings that your client had the contractual obligation to prepare - correctly - for the Committee.

and, it was stated that all disputes were to be governed by the law of the District of Columbia, as stipulated in POC's contract.

Keeney made the required notifications preliminary to filing Rule 11 sanctions but as of May 1, 1998, is yet to actually file with the Court.

99-04-393-1201

27.0

The Andersons filed suit in U.S. District Court,
Washington, D. C.

The Anderson Report's supporting references are:

27.1 July 5, 1995 -- Andersons file Complaint (Damages) for Libel.
The following discussion focuses only on the more significant issues vis-a-vis statements made in Utrecht's letter of June 29.

Libel Complaint, Paragraph 13 -- Establishes the term redesignation does not include or relate in any way to "overlimit" redesignations (from Tab 15, Doc D):

While the word "redesignation" may appear in other contexts in presidential campaigns (such as the transfer of funds from overlimit contributions), for purposes of this complaint, the term "redesignation" is limited to transfer of funds given by contributors not exceeding the contributors' legal limits. POC's responsibilities for Committee had nothing to do with redesignations.

. . . POC has no participation in the process other than after the fact computer records reconciliation.

Thus, the Andersons' Libel Complaint makes it clear, and the Anderson Report contains the documentary proof, that the overlimit redesignations (169) that POC obtained pertained to the transfer of only the portion of the contribution that exceeded the \$1000 limit and therefore, was of a different category of redesignation statement than those obtained by the CPC, which numbered 38,000 and pertained to the transfer of the entire contribution identified on the face of the statement. Keeney's references to POC's overlimit memo are irrelevant. As the Andersons' attorney makes clear, the Andersons are not complaining about, or denying that they obtained, the overlimit redesignation statements. Therefore, POC's responsibility for the overlimit redesignation statements, "admitted to" in the October 9, 1992, is clearly not proof POC also obtained 38,000 redesignation statements of a different category.

Libel Complaint, Paragraph 19 -- Establishes the fact that Utrecht's Response was not preliminary to a judicial proceeding any more than filing an income tax form is preliminary to a judicial procedure:

At the time [the Response was submitted] there was no administrative or judicial litigation pending or under serious consideration between Committee and FEC or the FEC staff.

Libel Complaint, Paragraph 24 -- Establishes the motive for Utrecht and the CPC for making the false statements about the Andersons:

None of the statements were privileged, because the Committee response was a part of an informal, non-judicial process followed at FEC and the statements were not made in anticipation of litigation, nor were they required by law nor made to petition the government for a redress of grievances. The statements were made to mislead the FEC staff and readers

of its anticipated audit, particularly as to the redesignations, because Committee was trying to treat the contributions as "undesigned" and sought a scapegoat for its own prior treatment of them as redesignations.

Libel Complaint, Paragraph 26 – The vendor list is attached to the Audit, thereby identifying all of the statements as relating to POC and being of and concerning POC and William and Patricia Anderson, and the vendor list publicly stated that the CPC's relationship to POC will be terminating, thereby causing readers to believe that POC was terminated for error, malfeasance and bad faith.

28.0

**Utrecht and CPC file Motion to Dismiss Andersons'
claim for libel damages.**

The Anderson Report's supporting references are:

99-04-393-1204

28.1 September 9, 1995 -- Utrecht and CPC file Motion to Dismiss.

28.2 Utrecht/CPC Attorney Keeney, in the Motion to Dismiss, restates the "concentric circles of privilege" and most of the other false and irrelevant claims originally stated in his June 29, 1995 letter. He does, however, add a motive for the Andersons' supposedly frivolous suit (from Tab 15, Doc E):

This is a frivolous lawsuit, barred by statute, by a disappointed corporate vendor that unsuccessfully sought employment with the 1996 Committee and filed this lawsuit against the 1992 Committee only after it was not selected to do similar work in 1996.

What Keeney is referring to, of course, is the unsolicited proposal the Andersons sent to Marsha Scott at the White House on February 23, 1995, discussion and excerpts of which are in Tab 16 of the Anderson Report.

28.3 What Keeney does not reveal is that POC's unsolicited proposal on February 23, 1995, which the Andersons submitted before they realized they had been used as the CPC's \$3 million scapegoat, was preceded by numerous solicitations initiated by the White House, beginning on September 13, 1994, and lasting through December 1994.

28.4 Specifically, the Andersons received a call from Mark Middleton, top White House aide formerly in charge of the State of Arkansas fundraising for the Clinton CPC and a person with whom Pat Anderson worked closely during the 1992 campaign. He asked that Pat Anderson meet with him and Marsha Scott, another high profile White House aide who was with the 1992 campaign; the meeting was to be at the Hay Adams Hotel in Washington, D.C., on September 13, 1994 with the purpose of discussing POC's services for the 1996 reelection effort. At that meeting, Middleton praised Anderson and POC. He stated lead time was running out for the 1996 reelection campaign and he wanted to start compiling a database using data from prior campaigns. He stated this was a difficult project, one that would involve a lot of duplicate records, and he wanted POC to do it because he trusted POC to do a high quality job. When Marsha Scott arrived, Middleton left. Marsha continued with praise for Anderson and her firm and stated that Bill Clinton's friend in Arkansas had not been able, after months and months of trying, to pull the necessary political database together as had been hoped and Anderson's expertise was badly needed. Anderson recalled thinking it was a slightly different story from Middleton's -- but what the heck.

28.5 Scott didn't name the friend who "couldn't pull the database together." Pat Anderson assumed she was referring to W.P. Malone who had been involved in the computer and software setup in Little Rock for the 1992 campaign. Anderson would later learn that as of the day of the meeting with Scott and Middleton, the CPC had already been making payments to Malone for a year, and before the payments ended in 1996, Malone would receive a total of \$842,100. Malone's mysterious "professional services" are discussed in Tab 17. Since Malone's past services to the campaign had involved computers and software, it stands to reason that the \$842,100 he received for his "professional services" (which was all the CPC would tell the FEC about payments) also related to computers and software.

28.6 Pat Anderson speculates that Malone was compiling the 1996 reelection database and otherwise getting ready for the 1996 campaign all the while being paid with 1992 primary campaign contributions. Anderson thinks the overtures from Scott and Middleton do not represent a sincere consideration of POC providing services to the 1996 campaign.

There are many reasons to support this theory, beginning with the fact that Utrecht was the attorney for both 1992 and 1996 campaigns and, obviously being in contact with the White House, it just doesn't track that two top aides were busy soliciting proposals from POC while the attorney for the 1996 reelection committee had stated in the first half of 1994 to the FEC that the relationship with POC would be terminated.

28.7 Pat Anderson speculates that the reason Middleton and Scott, considered by the press as Clinton Administration "insiders", solicited proposals from the Andersons could have been that they were actually monitoring the Andersons for any sign that the Andersons had learned about the false and defamatory statements Utrecht made about them to the FEC in July 1994.

Between September 13 and December 19, 1994, Scott, Middleton, and Scott's computer guru, Erich Vaden, also at the White House, had numerous conversations with Bill or Pat Anderson. Pat Anderson was given a demonstration of the White House WHO system by Vaden, at the Executive Office Building, and the Andersons were asked to submit several proposals and fee quotations, all related to compiling a database for 1996. This time period also corresponds to Utrecht's submission to the FEC of the original false statements (July 1994) and the Commissioners' final audit decision (December 1994).

28.8 This was a critical period for Utrecht and the CPC. If the Andersons had somehow found out that Utrecht had made false statements about them, the Andersons would have derailed the grand scheme by providing the FEC auditors with the documents to support the fact that the CPC, not the Andersons, obtained the redesignation statements. As discussed, the FEC would have then viewed Utrecht's "un"designated arguments as baseless. Her arguments would have been ineffectual.

28.9 Given that the success of the scheme was dependent upon the FEC not finding out that Utrecht supplied false information about the redesignation statements, it would have been nice to monitor the Andersons during this period in such a way as they would not suspect anything untoward was happening at the FEC, yet a rapport would be established so that if, by chance, the Andersons did find out about the scheme, they would more than likely first call Scott or Middleton to ask what was up before contacting the FEC.

28.10 Keeney refers to the February 23, 1995 Anderson proposal to the White House in all of his letters and legal documents defending Utrecht and the CPC. Therefore, it is clear Utrecht was in contact with Scott and Middleton, the recipients of the Andersons' proposals.

28.11 The Andersons may never know if the two White House aides were in on the scheme. There is no way to prove that Scott and Middleton were "monitoring" the Andersons using future business as the excuse to stay in contact with them. There is no way to prove that proposals were solicited from the Andersons that would be firmly set them up to be turned down -- thereafter to be called "dissappointed vendors."

The facts do show, however, that in the CPC's first legal filing, Keeney takes the opportunity to call the Andersons "disappointed vendors."

28.12 Further, the Andersons feel that if the White House aides were not in on the FEC scheme, then it shows that the first unit of business the Andersons and POC lost due to Utrecht's false statements was Bill Clinton's 1996 reelection campaign.

28.13 Keeney also states on page 14 of his Memorandum In Support of Motion to Dismiss, that the fact that POC was responsible for contributions (once again using POC's proposal on February 23, 1995 as POC's "admission" of responsibility for contributions) and the fact that the legal issue at the FEC concerned whether contributions were designated in writing for the primary, made POC responsible for the redesignations "although [POC] quibbles about the scope of its involvement."

These quibbles are legally immaterial because in this circuit: "substantial truth" is a defense of defamation.

You have to give this guy credit for trying. What he is saying is that if POC was responsible for contributions, and the FEC was discussing a legal issue regarding contributions (do they talk about anything else?), and POC did obtain 169 overlimit redesignations, then, combining these three, POC had some responsibility for the 38,000 redesignations the CPC obtained. Not true; the logic is not there. Keeney also states that any difference in scope the Andersons "perceive" between 169 overlimit redesignation statements and 38,000 regular redesignation statements amounted to "quibbles" and. a quibble is legally immaterial because a quibble equals substantial truth and substantial truth is a defense to defamation. He quotes a reference:

Slight inaccuracies of expression are immaterial provided that the defamatory charge is true in substance.

It is odd that he chooses the above reference. Perhaps slight inaccuracies, whether trying to prove or disprove defamation, are immaterial.

28.15 Pat Anderson states for the Anderson Report:

It is true my husband and I "perceive" a difference in scope between the two types of redesignations, anyone would.

Utrecht and the CPC are in serious denial of reality by trying to make the case that there is an "immaterial" difference between the 169 documents of one type and purpose that POC obtained and the 38,000 documents of another type and purpose the CPC obtained from Little Rock.

28.16 Keeney also refers to a portion of POC's July 9, 1993 letter (Tab 24, Doc AA) to Utrecht in which Bill Anderson explains that the CPC was not charged for a typographical error relating to the July 1992 report which caused a \$200,000 change in the amount of the figure as typed. Anderson stated POC regretted the error and stated there was no charge. Keeney tries to make the case that the CPC had to file amendments to correct POC's one typographical error. What Keeney fails to explain is why one typographical error deserves the following harsh and defamatory comment:

. . . failed to reconcile her records to the accounting data and bank reconciliation provided to her by the Committee's accounting department.

The issue, which Keeney fails to address, is not the typographical error or that POC regretted making it. The statement is false because the "information" that the CPC's accounting department provided "her" (Pat Anderson) with accounting data and bank reconciliation[s] is not true. At no time during 1992 did the CPC provide accounting data and bank reconciliation to Pat Anderson. Therefore, it is defamatory to state Pat Anderson failed to reconcile her records to what the CPC provided if the CPC didn't provide anything to which to reconcile.

28.17 Not only did Pat Anderson or POC not receive any reconciliations, the auditors did not see any either, evidenced by their statement in the Final Audit Report:

Although the Audit staff had requested all workpapers and bank reconciliations during the pre-audit inventory and during fieldwork, none was provided which related to the original reports filed with the Commission.

29.0

Andersons respond to Utrecht and CPC Motion to Dismiss.

In a very clear manner, the legal points of each of Utrecht's statements in the Motion to Dismiss are addressed by the Andersons' attorney, Mike Geltner.

The Table of Contents (Tab 15, Doc F) provides a convenient outline of the issues and are, basically, a concise and eloquent restatement of the Andersons' charges and refutation of Utrecht's statements in the Motion to Dismiss. (Tab 15, Doc F)

30.0

**Utrecht and CPC reply, again in Support
of Motion to Dismiss**

The Anderson Report's supporting references are:

30.1 October 10, 1995 -- Keeney's reply in Support of Motion to Dismiss. (Tab 15, Doc G)

30.2 Keeney in this final filing before the "privilege hearing" was granted, restates all of the privileges and produces a signed copy of POC's contract. Keeney states that the fact POC stated there was no contract is another example "of yet another false statement by plaintiff POC by plaintiff William R. Anderson."

30.3 The Andersons appreciate the CPC providing a signed copy of the contract, albeit not until nearly 4 years after its signing. The Anderson Report includes a copy of the contract (Tab 25) which Keeney provided. It is worth noting that not having a copy of the final signed contract with all signatures on it, did not prevent POC and the Andersons from fulfilling the provisions in the contract.

31.0

The Andersons's attorney and Utrecht's attorney argued before the judge.

The Andersons want their day in court -- Utrecht and the Clinton Committee are claiming privilege from having to defend any statements in court.

The Anderson Report's supporting references are:

31.1 November 17, 1995 -- Transcript of hearing on Motion to Dismiss for reason of "privilege."

The transcript of the hearing on whether or not Utrecht and the CPC are immune to the Andersons' libel claim by reason of privilege shows that Keeney, attorney for Utrecht and the CPC, feel that federal audits are protected from libel claims, even though the statements may be false (from Privilege, Tab 12):

The Court:

Is there some distinction, though, where under the audit power, they're really voluntarily entering into this to get the matching funds, it's not something the Commission is subpoenaing as a result of investigation they're doing, and their response is not mandatory; they just had an opportunity to respond but weren't required to respond? I mean, they just have to make the decision, your client, whether or not they're going to respond to this claim they owed \$3 million.

Mr. Keeney:

Well, Your Honor, I think "required" is not the statutory term, and if we start going down discussions of what the "required" means, we might miss the point. The point is the statutory term is "request."

The Court:

Let me ask you this: If you have a situation as here and then your client responds by saying, "Well, XYZ Company are crooks. They embezzled all this money, and they've got it all, and they even gave it to us, and they should be put in jail," is that protected?

Mr. Keeney:

Yes, Your Honor. That is exactly --

The Court:

What do you think they want to say in response, no matter how outrageous it may be, with no factual foundation under the law?

Mr. Keeney:

I think that's what Congress intended, Your Honor. It's hard to say when we don't have a legislative history --

The Court:

Right.

Mr. Keeney:

-- but this is about as broad as it can be and I think Congress intended, that the Commission was entitled to get all information, good information, bad information, 100 percent correct, not 100 percent correct, and the only way to guarantee they could get that information unimpeded was to broadly provide that all such information at the request of the Commission could not be the basis of civil liability to anyone other than the United States. So if you lie to the Commission, there are perjury problems, and the Commission can go after you, as can the U.S. Department of Justice.

31.2 Keeney's remarks reflect Utrecht and the CPC's position: that the FEC was entitled to "good information, bad information, 100 percent correct, not 100 correct" in order to be guaranteed it had "information."

It is doubtful the Commission feels entitled to "not 100 percent correct" or "bad information." How is the Commission expected to function and make decisions if it cannot expect and assume that the information it is receiving in written statements is 100 percent correct? Is it possible Utrecht and the CPC, i.e., President Clinton, can seriously take the position that the FEC is so desperate for "information" that it doesn't care, or concern itself with, whether the "information" is accurate or not?

31.2 Further, what kind of message would it send to the thousands of government contractors throughout the federal system who must submit to an audit if the firm or individual being audited can get away with making outrageous statements, as Utrecht did for the CPC, and walk away with a favorable audit decision as well as with full protection from libel claims?

Utrecht and the President's Primary Committee (CPC), in effect, believe that innocent people can be blamed for the actions of others in audits conducted by federal agencies. Are they suggesting that if your reputation or business is ruined, suing for libel damages cannot be an option because the federal agency involved is "entitled" to "bad information" and that protecting the flow of bad information is very important to the public good and if you don't like that, go to the U.S. Department of Justice and see what they can do about it? Can they seriously advocate such a policy or law?

31.3 If Utrecht's statements are true, as Keeney claims, and the Andersons prove in this Report that the statements are false and defamatory, a court of law should decide on the evidence and the documents and determine what are the facts. The entire purpose of the legal system, it seems to the Andersons, is that innocent people have recourse to protect their rights and their reputations, against anyone, including the politically powerful and well financed. Privilege in this case would take away a fundamental right: the legal recourse to protect one's reputation against false and defamatory statements, especially if used as a scapegoat in a fraud scheme, as the Andersons were used.

31.4 Last but not least, the following comment by Keeney quoted from the Hearing Transcript is very special.

Here, Keeney, at the same time he is trying to make the case the FEC was demanding information about POC and thus, the CPC's comments are privileged, he is forced to also make the case that POC was not identifiable by any of Utrecht's statements. In essence, he states to the Judge that the CPC, i.e., Utrecht, is adroit and clever enough to answer the FEC's very specific questions about POC without identifying POC -- an incredible feat by anyone's standards:

But here I think we have a very specific request [from the FEC] that asks us about this company. We answer in a way in which we don't even identify the company, Your Honor, and then we are dragged into court, alleging that there's something we said about the company that was incorrect.

The Andersons reply: you bet!

32.0

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A judicial ruling has not yet been made as to whether the Clinton Committee is protected from the Andersons libel claims.

The Andersons feel the ruling will be in their favor, not just because of this matter, but because the issue of whether a powerful entity is privileged to lie about innocent vendors in a federal audit in order to avoid legal penalty, is at stake.

99-04-393-1217

33.0

The false statements about the Andersons were the crux of Utrecht's ultimately successful arguments.

CPC co-counsel Laura Shachoy and CPC accountants in Little Rock must have been well aware that the statements about the Andersons were false.

Still, Shachoy signed off on MUR 4192, and the accountants, both intimately involved with the audit process, also "went along" with Utrecht's false and misleading story.

Had it not been a well planned, "group" endeavor, the auditors would have learned about the CPC's management of the seeking and obtaining the redesignation statements and they would have learned that the transfers were based on discrete batches of the statements and not Utrecht's "analysis." The scheme would have fallen apart and the CPC would have had to repay the full \$3.8 million in overpaid matching funds as originally called for by the auditors.

The Anderson Report's supporting references are:

33.1 Lyn Utrecht, Barbara Yates, Laura Shachoy, and Allen Wegehof were each intimately involved with CPC financial activities during 1992 and its actions and statements to the FEC auditors throughout all audit phases. Each must have known the Andersons and their firm had done an outstanding job for the CPC. Each must have known that the CPC, and not the Andersons, sought, obtained, and transferred money to the Compliance fund based on batches of the redesignation statements. Each must have known Utrecht's arguments would be unsuccessful if the FEC auditors found out about the true origin and usage of the redesignation statements.

Given the number of auditors, the lengthy audit period, the number of meetings, the volume and type of documents withheld from the auditors, and the number of false, defamatory statements made about the Andersons in all audit stages, and the number and type of documents in which the defamatory statements about the Andersons appeared, it is obvious the scheme could not have been successful without the complicity and full understanding of Yates, Shachoy, and Wegehof. Each must have "gone along with the story" during the audit. (Tab 4)

33.2 Each must have been complicit in withholding documents from the FEC auditors that would have shown that the Andersons maintained good records and working papers that could have provided answers to the auditors' questions. Yet harsh, defamatory statements were made against the Andersons even though the auditors were satisfied with the amendments.

33.3 Yates and Wegehof were responsible for the redesignation data on the Compliance funds' computer and were also responsible for sending lists of that data to Pat Anderson for her use in the redesignated contribution data "reconciliation" project. They must have been complicit in covering up from the auditors evidence of "batches" of redesignation forms and the relationship of the batches to the amounts transferred to the Compliance fund.

33.4 Each must have been complicit in looking ahead to the day when the Andersons would find out about the false statements. They must have conspired, or must have known about the conspiracy, to withhold payment to the Andersons in order to obtain "evidence" and "admissions" of mistakes from the Andersons, all of which have already been used by Utrecht and CPC against the Andersons. (Libel, Tab 15)

33.5 Yates, and Wegehof were present at every meeting that Utrecht had with the Andersons in the offices of Public Office Corporation, 911 Second Street, N.E., Washington, D.C., including the meeting where Utrecht instructed the Andersons to destroy computer files.

33.6 Each was complicit in continuing to pursue their false claims that the Andersons acted ineptly, unprofessionally, and greedily, by the act of obtaining the redesignation statements, as evidence that Shachoy and Utrecht repeated the false statements in the CPC's response to MUR 4192.

33.7 Their combined, fraudulent actions produced a stunning monetary victory against the FEC for \$3 million and destroyed the Andersons' reputation in the process. The CPC's actions, embodied in Utrecht, Shachoy, Yates, and Wegehof, appeared as bold, expert legal maneuverings which reduced the CPC's repayment from \$4.3 million to \$1.4 million and defended that outcome in MUR 4192.

33.8 The CPC's top people are now hiding from libel claims by attempting to make the case that the audit documents are "privileged" communications between the CPC and the FEC. Nonsense. What chaos would ensue if those being audited by a federal agency were "privileged" to lie. The overall strategy appears to be to prolong the process -- to drag this whole thing out -- until everyone in the process gets tired and, perhaps in years to come, when there is finally a trial, who will really care and who will be around to make amends? In the meantime, the Andersons have a ruined business that can no longer generate viable income or be sold. They are left with a ruined reputation and the obligation for payments on a small building on Capitol Hill that at one time provided offices for their once thriving business.

33.9 Lyn Utrecht was the CPC's general counsel beginning about September 1992; she was preceded by Christine Varney of Hogan and Hartson, Washington, D.C. Utrecht is a partner of Oldaker Ryan Phillips & Utrecht, Washington, D.C. She was a staff lawyer at the FEC during 1979-1984, deputy general counsel to the 1984 Dukakis presidential campaign; general counsel for Harkin 1992 presidential campaign. From the Andersons' perspective, it appeared that Utrecht orchestrated the scheme, or orchestrated it on the instructions from her superiors at the Clinton Primary Committee (CPC). (Tab 29, Doc A)

Utrecht was intimately involved with every facet of the CPC's FEC audit. She wrote and signed the CPC's response to the FEC Interim Audit Report in which the "new" arguments for the CPC to keep the money are presented, a key part of which was falsely blaming the Andersons as responsible for the redesignation statements. Utrecht was co-counsel with Laura Shachoy in MUR 4192 and signed off on the CPC's response to MUR 4192, a document in which a repeat of the false statements about the Andersons appeared. Utrecht was savvy of the FEC audit process and how to manipulate the FEC in order to get a favorable audit outcome and at the same time keep the money in the Compliance fund.

She called a meeting with the Andersons in January 1995, attended by Yates and Wegehoft, at which she told the Andersons the relationship between them and the CPC was being terminated. As soon as possible, she wanted all documents, every scrap of paper, that was not already in the storage room to be placed there and the keys turned over to the CPC. She instructed the Andersons to prepare to delete all computer files and contributor data relating to their work on the campaign. Before final payment was tendered, she stated, the Andersons would be required to sign a statement they had complied with the instructions, which also included not speaking to anyone about any matter relating to the 1992 CPC. (Tab 24, Doc BB)

After the Andersons discovered the false statements, they wrote a letter to White House Counsel Abner Mikva advising him of the problem (Tab 24, Doc CC). The Andersons never heard from Mikva. Utrecht entered the picture again when she must have instructed her attorney to blast the Andersons with "red herrings" as "proof" that what Utrecht had stated in the CPC's Interim Audit Response about the Andersons was true; Utrecht's attorney counter sued the Andersons and they, along with their attorney, Mike Geltner, was hit with the threat of sanctions.

At every turn of events, including referring to sales and proposal documents that the Andersons were requested to send to the White House during the fall of 1994 (details in Tab 16), Utrecht has boldly defended, in legal filings in response to the Andersons' suit, her false statements as true or substantially true. (Tab 15, Doc C, E, and G)

33.10 Barbara Yates, CPA, and a partner of Baird Kurtz and Dobson, a CPA firm located in Little Rock, Arkansas, was an active participant in the scheme. Yates was part of the group that prepared the inaccurate NOCO statements originally submitted to the FEC that manipulated the FEC into paying the CPC more than \$3 million in matching funds it did not deserve. She and her assistant, Allen Wegehoft, also an employee of Baird Kurtz and Dobson, were responsible for the Compliance fund's administration and its management of the redesignation statements as they were returned to Little Rock. Yates and Wegehoft, though located in Little Rock, have been present at every meeting that the Andersons had with Utrecht other than the occasions when Pat Anderson went to Utrecht's office to talk to the FEC auditors over Utrecht's speaker phone.

Barbara Yates prepared the debts and obligations schedules for the compliance reports, an activity that was also blamed on POC (Tab 9). Yates was intimately involved with the audit process and is quoted in the "exit" conference. She was also the one paying the bills. The scheme to withhold payment of the Andersons invoices is likely to have been coordinated between Utrecht and Yates. Wegehoft was responsible for sending the Compliance fund's lists of redesignated contributions to Pat Anderson at POC. He was also in charge of the CPC and Compliance fund computers in Little Rock.

33.11 Laura Ryan Shachoy, though located in Massachusetts, was very active in helping the CPC prepare for the audit; some of her activities involved working directly with the Andersons. She also wrote and signed the CPC's response to MUR 4192, a document in which Utrecht's original false statements about the Andersons were repeated. Shachoy must have known that the CPC, and not the Andersons, had obtained the redesignation statements.

33.12 Utrecht, Yates, Shachoy, and Wegehoft are legal and accounting consultants. The fund which benefitted the most in the fraudulent scheme was the legal and accounting fund of the general election, a fund restricted to paying only legal and accounting fees. All four were part of the general election's legal and accounting process.

34.0

The Clinton Primary Committee (CPC) had more than enough money to pay its debts — evidenced by the way it disposed of more than \$4 million AFTER receiving the undeserved matching funds.

The Anderson Report's supporting references are:

34.1 The Committee requested additional matching funds based on inaccurate NOCO financial statements. The FEC, unaware the Committee had unreported assets, paid the matching funds as the Committee requested. While the Clinton Committee was taking the federal matching funds money, ostensibly to pay debts it would otherwise not be able to pay, the Committee began disposing of more than \$3 million on non-primary campaign items.

34.2 The largest non-primary campaign expense was in the form of a series of transfers of money to the Clinton/Gore Compliance fund, for a grand total of \$2,444,557. The Compliance fund is supposed to raise its own money and, by law, may not receive federal money. Yet, the Committee began transferring contributions to the Compliance fund BEFORE it received its last matching fund payment. (Tab 11 and 14)

34.3 The next largest non-primary campaign expenditure was in the form of a series of payments to an Arkansas friend of Bill Clinton's, W.P. Malone. Malone's payments for "professional services" began in August 1993 (more than a year after the primary campaign was over) and continued through March 1996, Clinton's fourth year in office. The FEC never found out what Malone's "professional services" were for because the Clinton Committee refused to say more. The Commissioners disqualified the payments as primary expenses but took no additional action. Malone got to keep the money. The FEC, nor anyone else, know, even today, what Malone did to earn a total of \$842,100. [Details in Tab 17.]

34.4 The Committee repaid the U.S. Treasury \$270,384 in penalties for using matching funds money on other non-primary campaign expenditures. Among these was a payment of \$37,500 to Kimberly Moore, a campaign accounting department employee, who was apparently paid off not to bring sexual harassment charges against David Watkins, operations manager of the Clinton Campaign. [Details in Tab 18 of Report.]

34.5 The following summarizes the NON-primary items on which the Committee disposed of more than \$4.670 million AFTER it received an overpayment of matching funds from the FEC of \$3.6 million; clearly the primary committee had excess money even before it requested additional matching funds!

\$ 2,444,557	transferred to Compliance fund (GELAC)
842,100	non-qualified payments to W.P. Malone for unknown "professional services"
270,384	penalties for using matching funds in other non-qualified expenditures
40,859	penalties for Committee stale-dated checks (Audit Report, Tab 28, bottom page 95)
<hr/>	
\$ 3,597,900	non-qualified primary campaign expenditures AFTER receiving matching funds
1,072,344	reduced repayment of overpaid matching funds (should have been \$3.6 million)
<hr/>	
\$ 4,670,244	total money out of the primary bank account AFTER it received overpayment of \$3.6 m

35.0

The Committee's transfers had the effect of using federal money to subsidize the Clinton/Gore '92 Compliance fund by \$2.4 million -- the Bush/Quayle compliance fund received no such subsidy.

Thus, the distribution of public money, which purpose is to "level" the campaign playing field, actually "tilted" it -- before the fall election when it counted most -- in favor of the Clinton/Gore '92 campaign.

The Anderson Report's supporting references are:

35.1 Generically speaking, the GELAC, aka Compliance fund, component of a presidential campaign is restricted to paying for legal and accounting expenses incurred by its respective general election committee.

35.2 A compliance committee is funded by private contributions that cannot exceed \$1000 per contributor. Compliance funds may accept redesignated primary "overlimit" contributions, i.e., the portion of an individual's contribution to the primary that exceeds the \$1000 limit. The compliance fund may also accept non-excessive contributions redesignated from the primary provided the primary debts have been paid and the redesignation statement is signed within 60 days of the contribution's deposit. In 1992, both the Clinton/Gore and the Bush/Quayle campaigns established a compliance fund.

35.3 The 1992 Clinton/Gore and Bush/Quayle general election campaigns were each given a grant of \$55.24 million of federal money with which to conduct their respective campaigns. Federal law prohibits a general campaign committee from raising or accepting private contributions. Each campaign may not spend a penny more than the granted amount; legal and accounting expenses may be paid by funds in the respective compliance fund.

35.4 If there is not sufficient money in the compliance fund to pay the legal and accounting expenses of the general election, the money must come out of the general election's granted amount.

35.5 During September and October 1992, the Committee solicited from 55,000 primary contributors a signed redesignation statement which, the Committee told the contributors, would authorize it to transfer that contribution from the primary to the compliance fund. More than 38,000 contributors responded and the Committee, between September 30, 1992, and March 1, 1993, made 15 transfers of money from the primary bank account to the compliance bank account; each transferred amount equalled exactly the sum total of the individually redesignated contributions in the 15 "batches" transferred.

35.6 The FEC auditors, looking back in time, calculated that the redesignations were "not permissible" because the transfers had the effect of depleting the CPC's assets before its debts were paid, creating the artificial appearance of deserving additional matching funds.

35.7 The Clinton Primary Committee would not have had the \$2.4 million to transfer to the Compliance fund had not the FEC paid the CPC an additional \$3 million in matching funds (based on inaccurate NOCO financial statements).

35.8 Thus, the net effect of the Clinton Primary Committee transfers of \$2,444,557 to Compliance was that federal matching funds money subsidized the Clinton/Gore Compliance fund but not the Bush/Quayle compliance fund, effectively tilting the distribution of public funds in Clinton's favor by \$2,444,557.

35.9 The Clinton CPC thinks it is unfair to have to abide by the election laws:

The [Clinton] Committee argues further that to require the [Clinton/Gore '92] Compliance Committee to transfer the funds back to the Primary Committee would result in unfairness to the Committee because it may leave insufficient amount in the Compliance Fund to pay continued general election winding down costs.

(Final Audit Report, Tab 28, bottom page 89)

35.10 Letting the transfers stand is equivalent of subsidizing the Clinton/Gore but not Bush/Quayle campaign, thus the FEC auditors state:

Therefore, for the Commission to forgo the transfer from the Compliance Committee and the recapture of matching funds in excess of entitlement from the Committee, would constitute a matching fund subsidy for the Compliance Committee. Such a subsidy would be well beyond the statutory scheme.

(Final Audit Report, Tab 28, bottom page 90)

"Well beyond the statutory scheme" is a nice way of saying in violation of the law. Further, it means that the Clinton/Gore '92 compliance fund was subsidized by \$2.4 million in federal money but the Bush/Quayle campaign received no such subsidy.

35.11 Democratic Commissioner McDonald, during the December 1994 meeting, made the following statement in an attempt to sarcastically downplay both the Republican Commissioners' ire and the fact that what the Clinton Committee had done with the overpaid matching funds, by transferring \$2.4 million to a general election compliance fund) created an unequal distribution of the public's funds, giving Clinton/Gore effectively \$2.4 million more to spend than Bush/Quayle:

I can cite a number of cases where I feel as strongly as some of my colleagues about this case, and some of them when it actually made a difference before the election, instead of two years after.

(FEC Open Meeting Transcript, Tab 27, page 98-99)

35.12 But Commissioner McDonald is wrong; the issue did make a difference before the election of 1992. The CPC set aside assets in a separate bank account with the plan in mind to solicit those contributors to redesignate their primary contribution to the Clinton/Gore '92 compliance fund. Before the November election, \$1,470,330.57 had actually been transferred from the primary bank account to the Clinton/Gore '92 compliance fund and the CPC had already received matching funds payments of \$.8 million and \$2.8 million it did not legally deserve to replenish the primary's bank account.

The remaining \$1,000,000 in transfers were not made until after the November 3 election but for budgeting purposes, it didn't matter. The CPC already had the redesignation statements in hand and therefore could calculate exactly how much they could transfer based on batches of redesignation statements.

35.13 Clearly, the Democratic FEC Commissioners allowed the Clinton Committee to manipulate federal matching funds payments in such a way that the Clinton/Gore '92 Compliance fund received \$2,444,557 in federal matching funds without the same amount going to the Bush/Quayle compliance fund. Clearly, the money transfers and knowledge of future transfers occurred well before the November 3, 1992, general election and thus made a substantial difference to the Clinton/Gore '92 spending capability.

35.14 The Republican Commissioners were upset, to say the least:

Finally, it is grossly improper to adopt such a free-spending standard for only one candidate (the current President of the United States), while every other campaign in the same cycle has been held to a different and stricter rule.

(Republican Statement of Reasons, Tab 21, Doc C, page 8)

36.0

The FEC is easily manipulated.

The Anderson Report's supporting references are:

36.1 It is a criminal act to submit false and misleading information to a federal agency, U.S.C. Title 18, Section 1001 (Tab 29, Doc B/Tab 3, Doc B), but the FEC doesn't have the research issues, even if chicanery is suspected. The FEC can subpoena information but that action is rarely used because it requires valuable resources and drags out the process. (Tab 29, Doc G.1 and H)

In practice, this means that committees routinely ignore the requests of the auditors, as evidenced by numerous statements throughout the final audit report where the Clinton Committee refused to respond to the auditors' requests for information or documents. The CPC was obviously not worried about any repercussions. (Final Audit Report, Tab 28, examples on pages 9, 17, 23, 48, 49, 50, 53, 63, 65, 74, 75, and 76)

36.2 The FEC is abused "equally" by both Democrats and Republicans. (Tab 29, Doc H, Doc I, Doc J, Doc G.1)

36.3 The basic structure of the Commission, i.e., three Democrats and three Republicans, virtually ensures that past actions of a given committee will not be reversed if the committee has the support of its respective-party commissioners. It takes four votes to reverse any action, otherwise, the past action, whether illegal or not, stands. That is what happened during the Commission meeting regarding the matching funds overpayment for the 1992 Clinton Committee:

A motion was made to support the [FEC] Staff [auditors and general counsel] analysis requiring the application of private contributions to remaining net outstanding campaign obligations before the payment of further matching funds. That motion failed by a vote of three to three with [Republican] Commissioners Potter, Elliott and Aikens voting in favor and [Democratic] Commissioners McDonald, McGarry and Thomas voting against. A second motion to consider all post date of ineligibility contributions unmatchable unless specifically designated for the primary election also failed by the same vote.

(From FEC Final Audit Report, Tab 28, bottom page 94)

36.4 Information given in IRS Form 1040 instructions (Tab 29, Doc O) do not fully inform the taxpayer as to how the \$3 checkoff (Tab 29, Doc O.2) money is used. Absent announcements at the national nominating conventions advising viewers that tax dollars pay for the Democratic and Republican conventions, how are people to know? Further, very few people know that presidential nominees cannot accept private contributions toward the November election, given that the presidential nominees are often the signatory on fundraising letters that give the impression that the more money raised, the better the chances of the nominee getting the necessary votes for victory. Very few people outside the federal election process know how the FEC uses the taxpayers' money in this most unique of federal programs. Revenues from the checkoff are declining (Tab 29, Doc E and Doc W).

36.5 Lyn Utrecht learned the 'in's and out's' of the federal election law and the Commission practices during her employment at the FEC as an attorney from 1979-1981, and as Special Assistant General Counsel from 1981-1984. (Tab 29, Doc A)

36.6 The FEC Commissioners are politically appointed; Republican Commissioner Trevor Potter resigned in October 1995, and as of April 1, 1998, has not been replaced. In the meantime, decisions that have included the very controversial general election year 1996 have been made by a Commission comprised of 3 Democrats and only 2 Republicans. (Tab 29, Doc F, Doc G, Doc H.1, Doc I)

37.0

Bill Clinton personally guaranteed -- in exchange for public funding -- that he and his authorized committee would abide by the election law.

The Anderson Report's supporting references are:

37.1 Before receiving public financing, the candidate must personally guarantee to the FEC that he/she and the authorized committee, will submit to the FEC any information it requests and otherwise abide by the election law and pay penalties, as required.

A copy of Bill Clinton's personal guarantee that he and his authorized committee would abide by the election law and comply with FEC requests in exchange for the public's matching funds money, is in Tab 29, Doc K/Tab 3, Doc A.

37.2 In Tab 29, Doc P and Q, are pages from FEC first counsel's opinion on MUR 4192 (complete opinion text in Tab 21, Doc D) in which Lawrence Noble stated that the Clinton Committee, with President Clinton as legally responsible, had violated two statutes (statute text in Tab 29, Doc L and M).

37.3 Utrecht may respond that the Commission's later vote rejected Noble's opinion that William J. Clinton had violated the law and that is true. But it is also true that the Commission's vote was BEFORE even the Andersons were aware that the CPC had blamed them for obtaining the redesignation statements.

38.0

The Commissioners have not considered this issue before because they did not know until now that the Clinton '92 Committees made false statements and submitted them to the FEC.

The Anderson Report's references are:

99.04.393.1232

The Clinton Committee lied to the FEC in four very significant areas in carrying out its scheme to defraud the Commission of \$3 million in federal matching funds:

38.1 The CPC lied about its treatment of post-DOI contributions by blaming the Andersons firm, Public Office, for seeking and obtaining the redesignation statements by "mistake." The Commission acted upon the false information that the vendor, not the CPC, obtained the statements.

38.2 The CPC denied auditors access to documents and financial records that they must have known were in the possession of the Andersons.

38.3 The CPC hid from auditors an untold number of documents pertaining to the batches of redesignation statements the CPC had originally used as the basis to make the 15 transfers from the Primary to the Compliance fund, copies of which are in the Report. The Commission acted on the false information that the transfers were based on an "analysis" performed by the CPC.

38.4 The CPC made other false and misleading statements about the Andersons, blaming them for everything from not keeping good records to falsely identifying their firm "POC" as being responsible for debts and obligations schedules in order to reinforced to the FEC the idea that the Andersons were capable of obtaining the redesignation statements without the CPC's knowledge, and two, the FEC was led to believe that the CPC's problems with the Andersons' services was the reason the CPC had to file amended compliance reports, and thus justifying the CPC's high winding down costs.

The Commissioners voted twice to allow the controversial Clinton Committee actions to stand, once in the final audit meeting, and later in the MUR 4192 decision, but each vote was based on false and misleading information provided by the CPC which the Commissioners treated as true.

The Report shows that the CPC went to great lengths to "set up" the Andersons as responsible for seeking and obtaining the redesignation documents and even carried out certain of its plans to defend itself if the Andersons found out about the scheme.

The Commission has not considered the CPC's treatment of its post-DOI contributions in light of the evidence provided in this Report that proves:

The CPC -- not the Andersons through their firm, POC -- initiated and carried out the project of seeking and obtaining redesignation statements using its staff and other resources in Little Rock. Had the FEC known the true origin of the statements, the CPC would have had to repay the U.S. Treasury an additional \$3,000,000 in overpaid matching funds.

Anderson Report - Tab 3

7
3001-3016: Miscellaneous

Doc 3001-03/A -- Letter signed by Bill Clinton in which he guarantees he and his authorized committee will abide by the election law; he received matching funds in exchange for this guarantee.

Doc 3004&05B -- Regulations regarding statements or entries in general.

Doc 3006-09/C -- Background information regarding federal elections.

Doc 3010/D -- Summary of candidates who received matching funds for 1992 election.

Doc 3011/E -- FEC Chronology of events for Clinton committees.

Doc 3012-13/F -- Enumeration of Clinton Primary Committee's False Statements

Doc 3014/G -- Summary of transfers to which FEC auditors objected; total of \$2.4 million.

Doc 3015/I -- Summary of matching funds submissions.

Doc 3016/J -- Summary of significant "money events" for Clinton Primary Committee.

Doc 3017/K -- Anderson Report in a "Nutshell"

CLINTON
FOR
PRESIDENT
COMMITTEE

November 12, 1991

John Warren McGarry, Chairman
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Chairman McGarry:

As a candidate seeking to become eligible to receive Presidential primary funds, I certify and agree to the following provisions:

- I. I am seeking the nomination of the Democratic Party for election to the Office of President in more than one State. I and/or my authorized committee have received matchable contributions which in the aggregate exceed \$5,000 from residents of each of at least twenty States which with respect to any one person do not exceed \$250.00.
- II. I and/or my authorized committee have not incurred and will not incur qualified campaign expenses in excess of the expenditure limitations prescribed by 26 U.S.C. §9035 and 11 C.F.R. Part 9035.
- III. I acknowledge that I have the burden of proving that disbursements made by me, and any of my authorized committee or agents are qualified campaign expenses as defined at 11 C.F.R. 9032.9.
- IV. I and my authorized committee will comply with the documentation requirements set forth in 11 C.F.R. §9033.11.
- V. Upon the request of the Commission, I will supply an explanation of the connection between any disbursement made by me or my authorized committee and the campaign as prescribed by 11 C.F.R. §9033.1(b)(3).
- VI. In accordance with 11 C.F.R. §9033.1(b)(4), I and my authorized committee agree to keep and furnish to the Commission all documentation for matching fund submissions, any books, records (including bank records for all accounts) and supporting documentation and other information that the Commission may request.

3001

P.O. Box 615 • Little Rock, Arkansas 72203
Telephone (501) 372-1982 • FAX (501) 372-2292

Paid for by the Clinton for President Committee
Contributions to the Clinton for President Committee are not tax deductible.

- VII. As provided at 11 C.F.R. §9033.1(b)(5), I and my authorized committee agree to keep and furnish to the Commission all documentation relating to disbursements and receipts including any books, records (including bank records for all accounts), and documentation required by this section including those required to be maintained under 11 C.F.R. 9033.11, and other information that the Commission may request. The records provided for the post-primary audit shall also include production of magnetic media containing all information required to be maintained on my authorized committee receipts and disbursements, if my authorized committee maintains its records on computer. Upon request by the Commission, documentation explaining the computer software capabilities shall also be provided. The production of all computerized information shall be in conformance with 11 C.F.R. §9033.12.
- VIII. I and my authorized committee will obtain and furnish to the Commission upon request all documentation relating to funds received and disbursements made on my behalf by other political committees and organizations associated with me.
- IX. In accordance with 26 U.S.C. §9038 and 11 C.F.R. §9033.1(b)(7), I and my authorized committee shall permit an audit and examination pursuant to 11 C.F.R. Part 9038 of all receipts and disbursements, including those made by me, all authorized committees and any agent or person authorized to make expenditures on my behalf or on behalf of my authorized committees. I and my authorized committee shall facilitate the audit by making available in one central location, office space, records and such personnel as are necessary to conduct the audit and examination, and shall pay any amounts required to be repaid under 11 C.F.R. Parts 9038 and 9039.
- X. Pursuant to 11 C.F.R. §9033.1(b)(8), the person listed below is entitled to receive matching fund payments on my behalf which will be deposited into the listed depository which I have designated as the campaign depository. Any change in the information required by this paragraph shall not be effective until submitted to the Commission in a letter signed by me or the Treasurer of my authorized principal campaign committee.

Chairman
Federal Election Commission
Page 3


Name of person: Bruce Lindsey
Mailing Address: Clinton for President Committee
P.O. Box 615
Little Rock, Arkansas 72203

Designated Depository: Worthen National Bank

Address: 200 W. Capitol Avenue
Little Rock, AK 72201

- XI. Pursuant to 11 C.F.R. §9033.1(b)(9), (10), and (11), I and my authorized committee will: (A) prepare matching fund submissions in accordance with the Federal Election Commission's Guideline for Presentation in Good Order, including the provision of any magnetic media pertaining to the matching fund submissions and which conforms to the requirements specified at 11 C.F.R. §9033.12; (B) comply with the applicable requirements of 2 U.S.C. §431 et seq.; and the Commission's regulations at 11 C.F.R. Parts 100-115, and 9031-9039; (C) pay civil penalties included in a conciliation agreement imposed under 2 U.S.C. §437g against myself, any of my authorized committees or any agent thereof.

Sincerely,


Governor Bill Clinton

FEDERAL ELECTION
CAMPAIGN LAWS

Compiled by

THE
FEDERAL
ELECTION
COMMISSION



JUNE 1994

TITLE 18. CRIMES AND CRIMINAL PROCEDURE

§ 1001

refusing to make any political contribution, or working or refusing to work on behalf of any candidate. Any person who violates this section shall be fined not more than \$5,000 or imprisoned not more than three years, or both.

§ 1001. Statements of entries generally

Whoever, in any matter within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals or covers up by any trick, scheme, or device a material fact, or makes any false, fictitious or fraudulent statements or representations, or makes or uses any false writing or document knowing the same to contain any false, fictitious or fraudulent statement or entry, shall be fined not more than \$10,000 or imprisoned not more than five years, or both.

BACKGROUND on Federal Elections

Most taxpayers are familiar with the first question on IRS Form 1040 about whether or not to divert \$3 of their taxes to the Presidential Public Funding Program (Program). Beyond the checkoff question concerning funding for the only U.S. Government program which is at the direct mercy of the individual taxpayer, this unique government program receives little attention. Few know specifics of how the money is spent or how it is accounted for.

Rather, the public's attention has been focused on presidential funding of another type: campaign finance abuses regarding private contributions, particularly those solicited by the 1996 presidential candidates for themselves and their political party. Again, little attention has been given to abuses which have occurred in the checkoff Program even though every four years it gives more than twice as much money to each major presidential candidate than what each raises privately. Moreover, since its creation in 1976, the Program has poured over a billion dollars into the "political" process of electing the president of the United States.

The presidential election ritual begins every four years with state caucuses and presidential primary elections. Few of the voters and onlookers know that for example, in 1992, the presidential election year relevant to the Anderson Report, taxpayers provided a total of \$43 million which was paid by the Program in what is, in essence, "public assistance" to the field of Democratic and Republican presidential candidates who participated in the caucuses and primaries. During the summer of that same year, millions of Americans watched the Democratic and Republican political conventions on television. Not many viewers were aware, however, that the taxpayer-funded Program completely financed those events. Each political party had received a grant of \$11 million from the Program, the legal limit that could be spent by each party on its respective convention.

Also, within 48 hours of the end of each convention, the party's nominee received a \$55 million grant from the Program which is to be spent on the campaign of the presidential and vice presidential candidates -- all the money the election law allowed to be spent on the general election. Though the names of both President Bush and Governor Clinton appeared on many appeals for money during the fall campaign, not a penny raised from those fundraising efforts could be, or was, added directly to the \$55 million grant.

In addition to separate primary and general election committees, presidential candidates have yet a third committee, generically referred to as a "general election legal and compliance fund." The compliance fund is interchangeably known by its acronym GELAC. Unlike the primary and general election committees, however, the compliance fund is not supposed to benefit from money in the Program. Only private contributions, if specifically solicited for the compliance fund, are considered legal funding. Typically, nominees raise between \$3 and \$6 million for their compliance funds but there is no legal limit to the total amount of money that may be raised.

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The compliance fund is also restrictive in that it may spend its money only if paying expenses which have been determined by the FEC as qualified legal and accounting expenses of the general election committee. The general election committee itself has no restriction on the amount of money it may spend on legal and accounting expenses per se, as long as the fixed, overall spending limit imposed by the the amount of the Program's grant (\$55 million in 1992) is not exceeded.

Put another way, the compliance fund may pay as many of the general election's legal and accounting bills as there are funds available. The more legal and accounting expenses the general election can offload to the compliance fund, the more grant money will be left in the general election committee available for purchasing services and things like television ads, which more directly relate to getting the candidate elected in November.

The theory behind public financing of presidential primaries is to encourage qualified candidates to run for their party's presidential nomination by easing the candidate's burden of fundraising, thus giving candidates more time to devote to important public issues.

So far as the public financing of political conventions and the general election campaigns is concerned, the obvious objective is to create a "level playing field". By providing each party the same amount of public money to spend on the nationally televised political conventions and the ensuing presidential general election campaigns, supposedly the focus will shift from money to public issues.

To recap, the Program gives all of the money it receives from the \$3 checkoff to the political process of electing the president. First priority is given to setting aside money for the nominating convention grants; second priority is setting aside money that will be granted to the two general election nominees. The Program's remaining money is paid out to presidential primary candidates who qualify to receive assistance in the form of matching funds. None of the Program's money goes toward voter registration, or electronic voting booths, or the general administrative costs of the Federal Election Commission (FEC), the federal elections regulatory agency.

The FEC has the oversight responsibility for all campaigns relating to federal public office, that is, it tracks contributions and expenditures for all campaigns of candidates running for the U.S. Senate, the U.S. House of Representatives, and the President and Vice President of United States. The FEC is also the Program's administrator.

In exchange for public funds from the Program, the candidate gives a personal guarantee that the legal entity authorized as the candidates' agent, called a committee, will abide by the election law and fulfill any reporting and documentation requirements of the FEC. Even with the candidates' personal guarantee, the FEC's responsibility of dispensing the public's money fairly and making sure it is properly accounted for is a difficult job. (Tab 3, Doc A)

3007

As it is commonly known that making a false or misleading statement to a federal agency is a criminal offense (Tab 3, Doc B). Thus, the FEC presumes, as it should, that as an agency of the federal government, care is taken by candidates and committees to submit to it only truthful and, in theory, verifiable information in mandatory reports and statements. Like most federal agencies, however, it does not have enough resources to support a complete verification of information or full investigatory process.

Thus, the FEC auditors, general counsel, and commissioners rely solely on "the most recent" information submitted to it as the basis for enforcement decisions. Where candidates and committees need to change any information initially reported to the FEC, "amendments" to the original reports or subsequent statements to the FEC are always gratefully accepted and, thereafter, regarded as the latest information upon which enforcement and regulatory decisions are made.

Moreover, the FEC is faced with the challenge that the authorized committee of a candidate who accepted Program money, usually in the person of the committee's general counsel, will do everything possible to put a favorable "spin" on committee actions in order to maximize the committee's use of public funds and otherwise reduce any repayments the auditors might call for.

It is for this reason that the audit of committees receiving public funds are sometimes lengthy and laborious. Everyone has an opportunity to "have a say" about the "issues" at hand, which usually have to do with money and whether or not repayment is due the U.S. Treasury.

Final audit repayment decisions are made by the Commissioners, three Democratic and three Republican political appointees, who meet and discuss publicly the findings of the auditors before they vote. A 3-3 tie vote means a committee's past actions stand -- that is no action is taken by the FEC. Before the FEC can reverse a committee's past actions or require repayment, the Commissioners' vote must have at least a 4-2 split. If the three Democratic Commissioners unite their vote against the Republican Commissioners, a tie creates the situation that a committee does about what it pleases with political backing.

In 1992, Bill Clinton and Al Gore, on behalf of the Clinton/Gore '92 General Election Committee, accepted the Program's \$55 million grant with which to conduct their general election campaign (as did President Bush and Vice President Quayle for their general election committee). Before the general election, Bill Clinton's Primary Committee had received a total of \$12 million from the Program's matching funds assistance (George Bush's primary had received \$11 million in matching funds).

Two years later, after the completion of the audit of the Clinton Primary Committee, the FEC auditor's formally recommended that the Commissioners require the Clinton Primary Committee to repay a total of \$4.3 million, \$3.6 of

which they showed had been paid from the Program in excess of the Clinton Primary Committee's entitlement. The Clinton Primary Committee submitted legal arguments to avoid repayment. The Democratic Commissioners supported the arguments to repay the Program's money which had been submitted by the general counsel of the campaign committee of the first Democrat in the White House in twelve years. The FEC auditors, general counsel, and Republican Commissioners opposed the arguments to keep the \$3.6 million. A tie vote along party lines ensued and the Clinton Primary Committee's actions taken two years earlier went unchecked. The Clinton Primary Committee repaid some \$1.4 million of the \$4.3 million recommended originally by the FEC auditors.

The Anderson Report is a five-volume document concerning the controversial audit of President Clinton's first primary committee. It focuses on the main issue of the audit, overpaid matching funds, not from the standpoint of whether or not the Democratic Commissioners or the Republican Commissioners were right or wrong in their interpretation of the law, as reflected in their votes. The Democratic Commissioners are entitled to their legal opinion just as the Republicans, FEC auditors, and FEC general counsel are entitled to theirs.

Rather, the purpose of the Anderson Report is to show that the opinions of the Commissioners, both Democratic and Republican, were arrived at based on certain critical information given to the FEC by the Clinton Primary Committee's general counsel and that the information was COMPLETELY FALSE.

The Anderson Report also shows that those at the FEC -- on both sides of the issue -- used the false information in their arguments. The false information "enabled" the Democratic Commissioners to support the Clinton for President Committee and at the same time "prevented" those that opposed the Clinton Primary Committee's arguments from making more effective arguments that the money should be repaid. As such, the Anderson Report concludes that the false information submitted to the FEC by Clinton Primary Committee's general counsel stacked the audit outcome in the favor of the Clinton Primary Committee.

To recap: The Anderson Report recounts the arguments made by both sides. It does not stand in judgment of the arguments one way or another or weigh the merits of the arguments, one way or another. Rather it shows that the false statements materially affected the Commissioners' final vote. It is clear from the documented facts in the Anderson Report that if the Clinton Primary Committee had addressed the information truthfully, and not made the false and misleading statements, it would have had to repay the full \$3.6 million in overpaid matching funds (the bulk of the \$4.3 million total repayment) as the FEC auditors had originally recommended.

Public Funding

Update on the 1992 Matching Fund Program

By the end of March 1993, the Commission had certified almost \$42.9 million in matching funds to the 11 Presidential primary candidates who qualified for the 1992 matching fund program. March 1 was the last day candidates could request matching funds in an original submission. (Only three candidates made submissions on that date.) The Commission certified payments for the last submissions in late March, and the payments were made by the U.S. Treasury in early April. (See table below.)

Candidates may continue to make resubmissions through September 1993, although payments based on resubmissions will probably be small. (Resubmissions contain contributions that were previously rejected because of deficiencies in the original submission.) ♦

Matching Fund Payments Through April 1993

Candidate	Cumulative Total
Republicans	
Patrick Buchanan	\$ 5,199,987
George Bush	10,658,521
Democrats	
Larry Agran	269,692
Jerry Brown	4,239,405
Bill Clinton	12,536,135
Tom Harkin	2,103,362
Bob Kerrey	2,195,530
Paul Tsongas	2,995,449
Douglas Wilder	289,027
New Alliance Party	
Lenora Fulani	2,013,323
Natural Law Party	
John Hagelin	353,160
Total	\$42,853,591

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✓

CHRONOLOGY

CLINTON FOR PRESIDENT COMMITTEE

Pre-audit Inventory Commenced

12/7/92

Audit Fieldwork

2/2/93 - 8/31/93

→ EXIT CONFERENCE - 10/19/93
Interim Audit report to
the Committee

4/4/94

Response Received to the
Interim Audit Report

7/6/94

Final Audit Report Approved

12/27/94

CHRONONLOGY

CLINTON/GORE '92 COMMITTEE
AND

CLINTON/GORE '92 GENERAL ELECTION COMPLIANCE FUND

Pre-audit Inventory Commenced

5/3/93

Audit Fieldwork

6/6/93 - 8/31/93

Interim Audit Report to
the Committee

4/4/94

Response Received to the
Interim Audit Report

7/6/94

Final Audit Report Approved

12/27/94

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Enumeration of False Statements

ITEM 1. William R. Anderson and Patricia W. Anderson concur with the FEC general counsel's opinion in Matter Under Review 4192 that the Clinton for President Committee (Primary Committee), William J. Clinton, candidate, and the Clinton/Gore '92 General Election Legal and Accounting Compliance Committee (GELAC), William J. Clinton and Albert Gore, Jr., candidates, violated 11 C.F.R. 9003.3(a)(1), 104.14(d), and 9034.5(a) when the Primary Committee:

- Submitted inaccurate financial information in its Net Outstanding Campaign Obligation (NOCO) financial statements (Tab 21, Doc D, page 18), and
- Transferred \$2.4 million to the GELAC while the Primary Committee still had debts (Tab 21, Doc D, page 16).

ITEM 2. The Andersons provide proof in their Report that the Primary Committee and GELAC Committees led by Lyn Utrecht, general counsel in Washington, D.C., Laura Ryan Shachoy, co-counsel, from Boston, Massachusetts area, and Barbara Yates, its CPA in Little Rock, Arkansas, manipulated the FEC's decision making process by making false and misleading statements to the FEC during the audit of the Primary Committee. The Primary Committee also obstructed the justice sought by the Complainants in MUR 4192 when its attorneys repeated to the FEC in that matter, the same false statements about the Andersons that had originally been made during the audit.

The following enumerates the Primary Committee's false and misleading statements to the Federal Election Commission, a violation of 18 U.S.C. Section 1001:

- The Primary Committee falsely stated that its vendor POC, the Andersons' firm, sought and obtained approximately 38,000 redesignation statements without the knowledge of the Primary Committee. The Primary Committee stated that the redesignation statements should not have been requested and referred to a financial incentive provision in the vendor's contract to obtain additional documentation as the motive. The Anderson Report shows that the Primary Committee obtained the redesignation statements using its staff and other resources in Little Rock, Arkansas. (Refer to Tabs 4 and 5)
- As part of its coverup of the origin of the redesignation statements, the Primary Committee withheld information and original documents from the FEC auditors that could show a precise correlation between the 15 separate bank transfers (adding up to \$2,444,557) and the sum of the individual batches of redesignation statements, which, if taken all together, also add up to \$2,444,557. (Refer to Tabs 6, 7, and 14)
- The Primary Committee falsely stated that the \$2,444,557 transferred to the GELAC was a figure that could be accounted for by the Primary Committee's "analysis" of the disputed contributions. (Refer to Tab 7)

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3-F

- 99-04-333-4447
- The Primary Committee **made false and misleading statements** to the FEC that negatively reflected on the quality of the professional services and expertise of the Andersons and their firm POC, singling out POC as the only vendor that was not vigorously defended by the Primary Committee during the audit. (Refer to Tabs 8, 10, and 11)
 - The Primary Committee **denied the existence of work papers and records** thereby preventing the FEC from examining documents the Primary Committee must have known all along were in the possession of POC. (Tab 8)
 - The Primary Committee **falsely stated** in Attachment 5 of the final audit report that "POC" prepared Debts & Obligations Schedules from "inception through March, 1993" which gave the false impression that it was because of POC's poor services that the data was re-entered and amendments filed. POC assisted the Primary Committee for the first four months in 1992; thereafter, its accounting department in Little Rock filed the reports. (Refer to Tab 9, POC Did Not Prepare Debts & Obligations Schedules)
 - The Primary Committee **created the false impression** to the FEC that it was because of POC's unprofessional and poor quality work that the Primary Committee had to prepare the complete set of amendments that were filed in July 1993. POC's work was excellent in all respects. (Refer to Tabs 8, 10, and 11)
 - The Primary Committee **made misleading statements** that gave the false impression that POC's management of matching funds prior to Clinton's period of "ineligibility" was slow; Utrecht stated that slow processing created an "unfair" situation where the Primary Committee could not get its full entitlement of matching funds before it entered that period. (Refer to Tab 11, POC's Matching Funds Nearly Perfect)

The false and misleading statements were submitted to the FEC in either Utrecht's July 1994 Response to the FEC's Interim Audit Report for the Clinton for President Committee, or in Attachment 5 of the Clinton for President Committee's final audit report. (Tab 23, Utrecht's Interim Audit Response and Utrecht/Shachoy Response to MUR 4192)

Other statements represented informal information given to the auditors which they included in both their Interim Audit Report, released in April 1994, and Final Audit Report, released in December 1994.

Because the false and misleading statements represented "explanations" to the auditors' findings and concerns, they were repeated by the auditors and appeared in their report to the Commissioners, the final version of which -- with false statements appearing as truth in the official document -- was released to the federal election community. (Tab 28, Final Audit Report)

99-04-393-1248

GELAC TRANSFERS

4/28/93

GPA

Page 1

XFER DATE	ACT	XFER AMT	POC CODE	POC COMPUTER	NSF	REFUND	OTHER LIST	UNABLE TO IDENTIFY	TOTAL PROBLEMS	TOTAL ACCOUNTED FOR	DIFF
8-11-92	P	62365.50	0	8815.50	0.00	0.00	250.00	0.00	250.00	81885.50	500.00
10-05-92	P	1715901.52	0	73225.55	80.00	485.00	335.00	0.00	375.00	714200.55	1700.97
10-15-92	P	1944172.88	5	193918.12	200.00	20.00	0.00	65.00	270.00	184136.12	36.58
10-27-92	P	62118.00	5	62118.00	0.00	0.00	0.00	0.00	0.00	62118.00	0.00
11-05-92	P	81583.00	7	73050.00	0.00	6983.00	1050.00	0.00	8933.00	81083.00	600.00
01-12-93	P	19355.68	0	18192.68	0.00	25.00	615.00	0.00	640.00	18832.68	523.00
02-26-93	P	650.00	0	650.00	0.00	0.00	0.00	0.00	0.00	650.00	0.00
09-24-92	P	1000.00	0	NONE	0.00	0.00	0.00	0.00	0.00	0.00	0.00
07-08-92	P	2000.00	0	NONE	0.00	0.00	0.00	0.00	0.00	0.00	0.00
07-10-92	P	250.00	0	510.00	0.00	0.00	0.00	0.00	0.00	510.00	0.00

SUSPENSE	XFER DATE	ACT	XFER AMT	POC CODE	POC COMPUTER	NSF	REFUND	OTHER LIST	UNABLE TO IDENTIFY	TOTAL PROBLEMS	TOTAL ACCOUNTED FOR	DIFF
08-30-92	S	27691.51	5	27691.51	0.00	0.00	0.00	0.00	0.00	0.00	27691.51	0.00
10-06-92	S	251608.88	5	251608.88	100.00	15.00	0.00	50.00	105.00	0.00	250846.76	96.12
10-17-92	S	222191.00	5	222191.00	7.85	10.00	0.00	25.00	35.00	0.00	221811.00	38.00
11-05-92	S	195646.38	5	195204.03	0.00	1335.00	0.00	100.00	142.95	0.00	196646.38	0.00
01-14-93	S	40501.30	0	40501.30	0.00	0.00	0.00	35.00	100.00	0.00	40536.30	0.00
02-02-93	S	27290.37	5	25755.27	230.00	1250.00	0.00	270.00	1285.00	0.00	27040.37	249.51
02-11-93	S	336504.37	5	265137.56	100.00	1.85	0.00	280.00	1036.00	0.00	26654.37	2955.00
12-10-93	S	210076.56	5	207122.87	200.00	245.00	0.00	53.00	495.00	0.00	207121.58	1100.00
03-01-93	S	131375.43	5	131375.43	0.00	0.00	0.00	0.00	0.00	0.00	131375.43	0.00
03-15-93	S	14627.00	5	14627.00	0.00	0.00	0.00	0.00	0.00	0.00	14627.00	0.00

COA = 7,112,714.
Surplus = 1,307,006

Poc's Reconciliation

Overseer's Committee

GELAC Account

Supported by Databases of Signed Recds. from State ments submitted by Little Rock Staff.

3014

Summary of Matching Funds Submissions

Fund Report

Date Submitted	Subf	Gross \$ Submitted	Contributors	# Affidavits	\$ From Affidavits	\$ Error Rate	Final \$ Certified
12/02/91	S01	\$ 501,691.10	4,091	101	\$ unknown	.2	\$ 579,364.34
1/2/92	S02	831,209.23	4,516	367	\$ 81,505.90	.8	821,234.72
2/3/92	S03	663,306.00	3,785	765	166,822.50	1.2	656,265.21
3/2/92	S04	1,123,410.00	10,007	370	86,095.00	.8	1,112,938.95
4/1/92	S05	1,076,728.36	8,265	956	102,663.50	.6	1,070,845.65
5/1/92	S06	1,100,167.03	8,477	1,576	202,547.50	.0	1,098,479.93
6/1/92	S07	1,155,169.67	11,413	1,073	202,402.02	.0	1,153,098.67
7/1/92	S08	1,452,050.39	22,544	914	133,727.84	.0	1,431,599.39
8/3/92	S09	1,793,091.46	31,994	1,329	165,609.46	.4	1,786,327.45
9/1/92	S10	2,060,400.10	64,005	1,746	175,911.55	1.2	2,025,181.16
TOTALS		\$12,630,032.14		9,197	\$1,477,506.07		\$12,536,135.47

** Average contribution of "residing" matchable money.*

** * Average of contributions submitted with affidavit.*

NOTE: S10 submitted on September 1 is included to be the largest

Report \$ wise & volume wise Filed assembled in a single month.

'92 matching funds submissions generated by POC.

31

Summary of Significant "Money" Events - Clinton for President 1992

				Date Range	Deposits	# of contributions
P	E	GAO	Match#1	910801-910930	\$ 200,928	604
P	E	GAO	Match#1	911001-911031	643,677	3,145
P	E	GAO	Match#1	911101-911130	349,481	1,286
P	E	GAO	Match#2	911201-911231	2,079,808	5,902
P	E	GAO	Match#3	920101-920131	1,590,683	5,258
P	E	GAO	Match#4	920201-920229	2,288,926	12,136
P	E	GAO	Match#5	920301-920331	2,141,237	9,526
P	E	GAO	Match#6	920401-920430	2,396,679	10,071
P	E	GAO	Match#7	920501-920531	2,332,142	12,225
P	IE	GAO	Match#8	920601-920630	3,032,741	40,779
P	IE	GAO	Match#9	920701-920715	1,571,367	26,782
G	IE	GAO	Match#10	920716-920731	2,684,216	51,357
G	IE	GAO	Match#10	920801-920805	668,615	11,645
G	IE	GAO	NoDesig	X 920806-920820	1,544,110	30,967
G	IE	S	NoDesig	X 920821-920831	396,161	4,092
G	IE	S	NoDesig	X 920901-920930	469,253	6,472
G	IE	S	NoDesig	X 921001-921031	402,275	5,736
G	IE	S	NoDesig	X 921101-921130	166,821	1,772
	IE	S	NoDesig	X 921201-921231	65	4
					\$24,959,194	239,759

- P = Campaign inception to nomination, the official period of the Primary; afterwhich it began to wind down its operation even though it continued to accept contributions and request matching funds.
- G = Nomination through November national election represents General Election.
- E = Marks the deposits that were submitted for matching funds, the payments for which were RECEIVED during Clinton's eligibility, the period in which his Committee did not have to prove "need" to get matching funds.
- IE = Marks the deposits which were submitted for matching funds, the payments for which were received during Clinton's INeligibility, the period in which his Committee had to prove "need" before qualifying for matching funds.
- GAO = Contributions deposited in Primary Committee's regular account, the general operating account (GAO).
- S = Contributions deposited in the Primary Committee's "suspense" account which was opened August 21, 1992.
- Desig = Per Utrecht's arguments, post-nomination contributions which were properly designated to the Primary Committee and thus matchable.
- NoDesig = Per Utrecht's arguments, contributions which were NOT properly designated to the Primary Committee which should inure to the GELAC. No difference could be found by the auditors between Desig & NoDesig.
- Match# = Marks period in which contributions were submitted for matching funds. Requests containing the previous month's contributions were submitted at the beginning of the month and the FEC certified an amount which was paid to the Primary Committee at month's end.
- X = Marks the period during which the Primary Committee received \$2.9 million in contributions, none of which were submitted for matching funds. Utrecht, in her written Response, stated the Primary Committee performed an analysis of the \$2.9 million and determined that \$2.7 million was not properly designated to the Primary; she stated that is where the \$2.4 million transferred to the GELAC came from. There may have been an analysis, but the \$2.4 million came from the sum of 15 batches of redesignation statements, each correlating to one of the 15 lump-sum transfers shown on the GAO and suspense bank statements as going to the GELAC; that relationship was kept from the auditors.

3016

3-J

ANDERSON REPORT -- NUTSHELL

FIRST PLAN - STEP ONE: CPC causes FEC to pay matching funds to which it not entitled.

- > By not reporting assets deposited in "suspense" account.
- > By liberally estimating future winding down obligations.
- > Combination made CPC appear to FEC to be much poorer than it really was.

FIRST PLAN - STEP TWO: CPC shifts "excess primary assets" to Compliance fund.

- > By using undeserved \$3.6 million in matching funds as "receivable" to "calculate" excess money.
- > By requesting of remaining 55,000 "primary" contributors they sign "REdesignation" statement.
- > By processing some 38,000 returned signed redesignation statements into "batches".
- > By making 15 transfers (total \$2.4 million) to Compliance fund based sum of contribs in batches.

FIRST PLAN FAILS:

- > FEC auditors on firm legal ground that CPC may not request/receive matching funds while shifting "primary" assets to Compliance fund; redesignation statements "not permissible" under those conditions.
- > Auditors nicely showed CPC had money to pay debts, repay Treasury \$3.6 million, and still leave some \$1 million in the Compliance fund (thus utilizing some, but not all) redesignation statements.
- > Speculate someone had egg on face; CPC legal team should have known FEC regs did not permit viewing matching funds as "receivable" asset when "calculating" "primary" contributions in excess of debts.

SECOND PLAN - STEP ONE: CPC avoids repayment; states 55,000 contributions are "non-primary".

- > By citing arcane reg requiring contributions to "federal" elections received after "last" election (Clinton's nomination) must be designated "in writing"; otherwise must inure to "next" election.
- > By claiming CPC contributions in question to be non-primary because no "in writing" designation existed; stated contribs belonged to "next" election; stated Compliance fund was "next" election.
- > If contrib status was non-primary, then CPC off hook for not reporting "primary" assets and could then shift "non-primary" assets to Compliance fund while CPC still in debt; "last/next" only legal point.

SECOND PLAN - STEP TWO: CPC covers up evidence contrary to "legal" foothold in "last/next" reg.

- > By stating redesignation statements unnecessary; calling them superfluous.
- > By obliterating "legal" significance of redesignation statements (which were "in writing" designation CPC claimed was necessary, but lacking, before contribs to be "properly" designated for primary).
- > By stating to FEC redesignation statements existed solely as result of actions by inept vendor which had greedily obtained the 38,000 redesignation statements without knowledge of CPC.
- > By stating checks made payable to CPC not sufficient "in writing"; cite FEC Helms Opinion as support.
- > By covering up correlation of "batches" of signed statements to 15 transfers with CPC "analysis".

SECOND PLAN SUCCEEDS:

- > Democratic Commissioners supported necessity of "in writing" designation if contribs to be primary; they viewed redesignations only as proof contributor wanted contribution to go to Compliance.
- > Republican Commissioners could not overcome (false) information that redesignations were a "mistake"; unable to make Democratic Commissioners acknowledge that CPC treated early "post-nomination" contribs as "properly" designated primary contribs (and matched), while later "post-nomination" contributions were treated as "not properly" designated and shifted to Compliance fund.
- > Two 3-3 Commissioner tie votes ensued; actions of CPC went unchecked.

SECOND PLAN's "LEGAL" ARGUMENT SUCCESSFULLY DEFENDED:

- > FEC Matter Under Review 4192 was FEC complaint protesting audit outcome.
- > CPC defended the audit outcome by repeating its only "legal" foothold ("last/next" argument) and also stated again that it was the vendor which obtained "unnecessary" redesignation statements.
- > FEC general counsel (not so nicely) recommended that there was reason to believe CPC violated two laws (inaccurate financial statements to FEC and shifting primary money while CPC still in debt)
- > Nevertheless, Democratic Commissioners still voted another 3-3 tie and FEC dropped MUR 4192; original complainants now in appeal after first suit failed to make FEC enforce election law.

VENDOR SUES CPC & its general counsel for libel - tied up in court 3 years; CPC claims privilege.

- > Vendor reveals to FEC, Justice, & Burton Cmte. evidence that CPC made false statements.

CPC = Clinton Primary Committee

3017



Anderson Report - Tab 4

4003-4040: Documents which show POC did not obtain redesignation statements

As explained in Documentary References (Tab 2, Sections 2.0 and 3.0) the Clinton Primary Committee, beginning in September of 1992, sought from the last 55,000 of its contributors, redesignation statements. Some 38,000 of its contributors signed the statements which the CPC then used as legal justification for transferring \$2.4 million from the "primary" to the Clinton/Gore '92 general election Compliance fund. These signed statements proved the contributions were first primary campaign contributions. It was only after being asked to do so, did the contributors reassign (redesignate) their primary contributions to the general election's Compliance fund.

The FEC auditors, however, did not view the signed statements as legal justification for transferring "primary" contributions while the CPC was simultaneously receiving matching funds payments from the FEC. The regulations state this is illegal. In addition, the FEC auditors stated that the CPC should have applied all contribution assets to its debts before calculating additional entitlement to federal money. (The CPC had failed to report assets in a newly opened bank account to the FEC -- an action which was part of the reason the FEC had overpaid the CPC to begin with.) The auditors recommended repayment of some \$3.6 million.

To justify keeping the money in the Compliance fund and to justify not reporting all of its assets while requesting matching funds, the CPC claimed the 55,000 contributions were "not primary" contributions after all because the contributions had not been properly designated "in writing" to the election (primary nomination) just passed.

If viewed as non-primary contributions, the CPC was off the "legal" hook for not reporting "primary" assets to the FEC and off another "legal" hook for transferring "primary" contributions to the general election while still accepting matching funds to pay its debts.

The only problem was that the signed documents which had obtained months earlier from Little Rock headquarters proved the contributions were, in fact, properly designated "in writing" to the primary -- the signed statements proved the contributions were primary contributions.

To hide and otherwise negate that legal proof, the CPC denied its responsibility for its affirmative action of seeking and obtaining the signed statements. Rather, it claimed to the FEC that the signed statements existed because a greedy and inexperienced vendor, the Andersons' firm which the FEC auditors knew was located in Washington, D.C., obtained the statements without the CPC's knowledge.

This section contains documents -- the hard evidence -- that it was the CPC, using its staff and other resources in Little Rock, which obtained the signed statements. The Anderson Report labels this egregious false and misleading statement as "False Statement #1".

Clinton Primary Committee's False Statement #1:

"The auditors focused here on whether these contributions were properly redesignated to the Compliance Fund, but, in fact, in order to have been considered primary contributions in the first instance, the regulations required that they be designated in writing for the primary. Very few of them were so designated. The Committee's vendor who processed these contributions treated them as "redesignations" even though they were not. That vendor's contract had been negotiated early in the campaign by the Committee's original counsel and included an incentive for the vendor to treat contributions as though additional documentation or affidavit was necessary. Under the contract, the vendor received an additional amount per contribution for which additional documentation or an affidavit was obtained. The Committee staff did not see these contributions until well after the election, but relied solely on the vendor's expertise to handle the contributions appropriately."

**From Clinton Primary Committee's (CPC) Interim Audit Response
Submitted to FEC on July 6, 1994, by CPC General Counsel Lyn Utrecht
Full text in Tab 23, Doc A, 23040 (original bold emphasis is shown)**

False Statement #1 as understood and repeated by the FEC auditors:

"...The Committee states that the redesignations were obtained by the vendor who processed contributions for the Committee without the Committee's knowledge. The explanation suggests that due to provisions in that vendor's contract, the vendor stood to gain by sending the redesignation requests."

**Quoted from FEC Final Audit Report on Clinton Primary Committee
Released December 27, 1994
Full text in Tab 28, Doc 28089 (full discussion pages 28084-28096)**

False Statement #1 as understood and repeated by the FEC's General Counsel:

"In response to the interim report, the Primary Committee [CPC] argues that the subject contributions were undesignated, and thus, under 11 C.F.R. 110.1(b)(2) (ii), could be viewed as GELAC [compliance fund] contributions since they were received after the candidate's DOI [date of ineligibility/nomination]. The Primary Committee contends that the redesignations were performed by mistake by a former vendor."

**Quoted from Memorandum to FEC Audit Division from FEC General Counsel
Lawrence Noble, dated November 3, 1994; this memorandum is included
as part of the FEC Final Audit Report Released December 27, 1994
Full text in Tab 21, Doc 21016**

Tab 64 - Description of Documents Which Refute CPC's False Statement #1:

Doc 4003/A -- Copy of a memo from Pat Anderson to Bill Anderson on September 4, 1992, in which Pat states that POC must complete the data entry and send mag tapes on a daily basis to Schuh Advertising for the "conversion of primary contribs to G[E]LAC contribs."

Doc 4004/B -- Copy of a note from Schuh Advertising to Pat Anderson requesting a correction in the magnetic tape format for the "Redesignation Letter" data.

Doc 4005/C -- Copy of a manual log of the tapes and records sent to "LR [Little Rock] Schuh Advertising" and showing the "suspense" data sent to Aristole Computing in Washington, which first used the tape and then forwarded it to Schuh to include in the redesignation mailing.

Doc 4006-13/D -- Copies of the tape layout that accompanied each different tape sent to Schuh Advertising directly from POC between September 10 - 17, 1992.

Doc 4014-15/E -- Copy of an actual redesignation letter sent from Little Rock (Doc E.2 shows original envelope and post marks). The letter refers to a contribution received in November but the form at the bottom of the letter is exactly like the form of an actual signed redesignation form as shown in Document F.

Doc 4018/F -- Copy of redesignation statement from the original batch of redesignation statements transferred September 30, 1992; a copy of the entire batch is in Tab 06.

Doc 4019/G -- The facsimile of Bill Clinton's signature which POC used on thank you letters; it does not match the facsimile signature on the redesignation letter shown in Doc E.

Doc 4020-23/H, H.2, and I -- Show that POC's instructions were to include checks that had any reference to the General Election on the redesignation mag tapes sent to Schuh.

Doc 4024/J -- Copy of a page from the GELAC's disbursement schedule for September 1992; it shows that the GELAC wrote a check for \$10,150.00 on September 16, 1992, to the U.S. Postmaster for the "Redesignation Letters", showing Little Rock was purchasing the postage.

Doc 4025/K -- Copy of page from the same GELAC disbursement schedule for September 1992; it shows that payments of \$18,043.74 on 9/28/92 and \$19,469.83 on 9/29/92, both to Lloyd Schuh Advertising and both for the purpose of the "Redesignation Mailing."

Doc 4026/L -- Letter from an investigator hired by the Andersons attorney, Mike Geltner; the investigator, John Roche, confirmed in the letter that Scott Schuh of Schuh Advertising had been contacted and that he was familiar with the "redesignation" project and said that "Schuh also handled this for the campaign."

Doc 4028/M -- Copy of the original invoice from POC to the Primary Committee on September 16; it was later amended (Doc 4029/N) and invoiced to the Clinton/Gore Committee on October 21, 1992 for the "Schuh Advertising project."

Doc 4030-37/O -- Show examples of the management of checks for which a redesignation statement was not necessary but the practice of the Primary Committee was to obtain one.

Doc 4038/P -- Copy of manual log of the affidavits that POC sent out for the month of September; it is clear POC did not mail thousands of redesignation letters. POC did obtain the required compliance documentation for the Primary Committee.

Doc 4039/Q and 4040/R -- From FEC Interim Audit Report showing recommendation for \$3.6 million repa

Memo
POC Computer
dated 9/4/92

Sep 4. Memo

THINGS THAT NEED TO BE DONE TO CLINTON DATABASE:

- finish data entry of August batches; currently working on Aug 7 - must go to Aug 20 or so

requirement #1: finish all data entry by September 17 in time for balancing and reporting on the 20th FEC report

requirement #2: daily, a 9-track tape must be produced of the previous day's entries; this tape will be shipped to Little Rock to a firm that is helping with requesting conversion of primary contribs to GLAC contribs - 1st tape due out of here on Tuesday, Sep 8

PWA has said that about 2500 per day will be sent to LR

✱

4003

TAB 04 - A



"ON-TARGET MARKETING"

LLOYD SCHUH ADVERTISING, INC.

(501) 374-2332

FAX (501) 372-6570

**TO: PAT ANDERSON
FROM: SCOTT SCHUH
RE: CLINTON TAPE OUTPUT**

**DATE: 9/9/92
TIME: 9:08 pm**

Pat, upon loading your first tape for the "Redesignation Letter" data, I find that you have only provided the Name/Address information on your tape and none of the Date/check number/payment info. that is required on this job.

Your record length and block length on the tape is 247, whereas your complete record length is 280 from the record layout supplied.

Please re-run this first tape ASAP and configure all subsequent tapes to include your complete record layout information. Phone me for questions....thanks!

P.S. I am told by Greg McMahon that we will require greater amounts of names/data to meet our client's established deadlines. Let us know exactly what to expect from your production....thanks again.

Direct Mail Marketing • Computer Services • Premiums & Specialties

P. O. Box 3775 Little Rock, AR 72203

4004

Tab - B
04

Schedule for making tapes to L.R. Advertising

# August Batch		Approx cost	Time to L.R.
6	112	3393	9/8
7	133	4356	9/9
10	152	5500	9/11
11	110	3600	{ 9/14
12	110	3600	{ 9/14
13	125	4000	9/15
14	136	4000	9/16
17	101	3000	9/17
18	29	<div style="display: flex; align-items: center; justify-content: center;"> <div style="font-size: 4em; margin-right: 10px;">}</div> <div> <p>Suspense data sent to Aristotle then to L.R.</p> </div> </div>	9/18
19	24		9/21
25	2		9/22
24			
26	2		9/23
28	2		9/24

4005

Tab 04-C

99.04.393.1257

Clinton for President

9/10/92

Tape #1 - 7749 records comprising all deposits for 8/6/92 and 8/7/92
(sent FEDEX p.m. of 8/6 and 8/7 to Schuh Advertising, Little Rock)

All tapes in this series are produced using the following specifications:

1600 BPI - EBCDIC - Upper/Lower Case output - fixed length, fixed format

FIXED FORMAT:

PREFIX	15	characters (Mr., Mrs., Ms., Miss, etc.)
NAME	30	char (lastname, suffix, firstname initial) (Ex: McGregor, Jr., F. Roger) (reverse after last comma then drop last comma)
NICK	15	char (Roger or Mrs. Jones, depending if we have first name)
TITLE	40	char (President, Chairman, etc.; blank if home address)
BUS NAME	40	char (ABC Clothing; blank if home address)
AD1	40	char (1313 Bishop Lane)
AD2	40	char
CITY	20	char
ST	2	char
ZIP	5	char
PDAT	8	char (YYMMDD format where 920806 = August 6, 1992)
PBAT	3	char (nnn format where 001 is first batch of 920806's deposit)
PSEQ	2	char (nn format where 22 indicates 22nd check within a batch)
PDOC	6	char (alpha/numeric format giving check number)
PAMT	7	char (where 22.50 indicates \$22.50 and 250 indicates \$250.00)
PEVT	7	char (where SPR indicates "pre-convention team")
END OF RECORD		

If you have any questions, call Pat Anderson in Great Falls, Virginia,
at 703/406-0209 or the Washington, D. C., office of Public Office Corporation,
202/675-4900. Please don't hesitate to call.

4006

Tab04-D

Clinton for President

9/11/92

Tape #1 - 4858 records comprising all deposits for 8/10/92
(sent FEDEX to Schuh Advertising, Little Rock)

All tapes in this series are produced using the following specifications:

1600 BPI - EBCDIC - Upper/Lower Case output - fixed length, fixed format

FIXED FORMAT:

PREFIX 15 characters (Mr., Mrs., Ms., Miss, etc.)
NAME 30 char (last name, suffix, first name initial)
(Ex: McGregor, Jr., F. Roger)
(reverse after last comma then drop last comma)
MICK 15 char (Roger or Mrs. Jones, depending if we have first name)
TITLE 40 char (President, Chairman, etc.; blank if home address)
BUS NAME 40 char (ABC Clothing; blank if home address)
AD1 40 char (1313 Bishop Lane)
AD2 40 char
CITY 20 char
ST 2 char
ZIP 5 char
PDAT 8 char (YYMMDD format where 920806 = August 6, 1992)
PBAT 3 char (mm format where 001 is first batch of 920806's deposit)
PSEQ 2 char (nn format where 22 indicates 22nd check within a batch)
PDOC 6 char (alpha/numeric format giving check number)
PANT 7 char (where 22.50 indicates \$22.50 and 250 indicates \$230.00)
PEVT 7 char (where SPR indicates "pre-convention team")
END OF RECORD

If you have any questions, call Pat Anderson in Great Falls, Virginia,
at 703/406-0209 or the Washington, D. C., office of Public Office Corporation,
202/675-4900. Please don't hesitate to call.

4007

Tab04-D.2

SECRET "SECRET" NO "SECRET"

Clinton for President

9/14/92

Tape #1 - 6795 records comprising all deposits for 8/11/92 and 8/12/92
(sent FEDEX to Schuh Advertising, Little Rock)

All tapes in this series are produced using the following specifications:

1600 BPI - EBCDIC - Upper/Lower Case output - fixed length, fixed format

FIXED FORMAT:

PREFIX 15 characters (Mr., Mrs., Ms., Miss, etc.)
NAME 30 char (lastname, suffix, firstname initial)
(Ex: McGregor, Jr., F. Roger)
(reverse after last comma then drop last comma)
NICK 15 char (Roger or Mrs. Jones, depending if we have first name)
TITLE 40 char (President, Chairman, etc.; blank if home address)
BUS NAME 40 char (ABC Clothing; blank if home address)
AD1 40 char (1313 Bishop Lane)
AD2 40 char
CITY 20 char
ST 2 char
ZIP 5 char
PDAT 8 char (YYMMDD format where 920806 = August 6, 1992)
PBAT 3 char (nnn format where 001 is first batch of 920806's deposit)
PSEQ 2 char (nn format where 22 indicates 22nd check within a batch)
PDOC 6 char (alpha/numeric format giving check number)
PAMT 7 char (where 22.50 indicates \$22.50 and 250 indicates \$250.00)
PEVT 7 char (where SPR indicates "pre-convention team")
END OF RECORD

If you have any questions, call Pat Anderson in Great Falls, Virginia,
at 703/406-0209 or the Washington, D. C., office of Public Office Corporation,
202/675-4900. Please don't hesitate to call.

4008

Tab 04 - D3

Clinton for President

9/15/92

Tape #1 - 3730 records comprising all deposits for 8/13/92
(sent FEDEX to Schuh Advertising, Little Rock)

All tapes in this series are produced using the following specifications:
1600 BPI - EBCDIC - Upper/Lower Case output - fixed length, fixed format

FIXED FORMAT:

PREFIX	15	characters (Mr., Mrs., Ms., Miss, etc.)
NAME	30	char (lastname, suffix, firstname initial) (Ex: McGregor, Jr., F. Roger) (reverse after last comma then drop last comma)
NICK	15	char (Roger or Mrs. Jones, depending if we have first name)
TITLE	40	char (President, Chairman, etc.; blank if home address)
BUS NAME	40	char (ABC Clothing; blank if home address)
AD1	40	char (1313 Bishop Lane)
AD2	40	char
CITY	20	char
ST	2	char
ZIP	5	char
PDAT	8	char (YYMMDD format where 920806 = August 6, 1992)
PBAT	3	char (nnn format where 001 is first batch of 920806's deposit)
PSEQ	2	char (nn format where 22 indicates 22nd check within a batch)
PDOC	6	char (alpha/numeric format giving check number)
PAMT	7	char (where 22.50 indicates \$22.50 and 250 indicates \$250.00)
PEVT	7	char (where SPR indicates "pre-convention team")
END OF RECORD		

If you have any questions, call Pat Anderson in Great Falls, Virginia,
at 703/406-0209 or the Washington, D. C., office of Public Office Corporation,
202/675-4900. Please don't hesitate to call.

4009

TAB04-D.4

Clinton for President

9/16/92

Tape #1 - 3688 records comprising all deposits for 8/14/92
(sent FEDEX to Schuh Advertising, Little Rock)

All tapes in this series are produced using the following specifications:

1600 BPI - EBCDIC - Upper/Lower Case output - fixed length, fixed format

FIXED FORMAT:

PREFIX	15	characters (Mr., Mrs., Ms., Miss, etc.)
NAME	30	char (lastname, suffix, firstname initial) (Ex: McGregor, Jr., F. Roger) (reverse after last comma then drop last comma)
NICK	15	char (Roger or Mrs. Jones, depending if we have first name)
TITLE	40	char (President, Chairman, etc.; blank if home address)
BUS NAME	40	char (ABC Clothing; blank if home address)
AD1	40	char (1313 Bishop Lane)
AD2	40	char
CITY	20	char
ST	2	char
ZIP	5	char
PDAT	8	char (YYMMDD format where 920806 = August 6, 1992)
PBAT	3	char (nnn format where 001 is first batch of 920806's deposit)
PSEQ	2	char (nn format where 22 indicates 22nd check within a batch)
PDOC	6	char (alpha/numeric format giving check number)
PAMT	7	char (where 22.50 indicates \$22.50 and 250 indicates \$250.00)
PEVT	7	char (where SPR indicates "pre-convention team")
END OF RECORD		

If you have any questions, call Pat Anderson in Great Falls, Virginia,
at 703/406-0209 or the Washington, D. C., office of Public Office Corporation,
202/675-4900. Please don't hesitate to call.

4010

TAB 04-D.5

Clinton for President

9/16/92

Tape #2 - 113 records miscellaneous
(sent FEDEX to Schuh Advertising, Little Rock)

All tapes in this series are produced using the following specifications:
1600 BPI - EBCDIC - Upper/Lower Case output - fixed length, fixed format.

FIXED FORMAT:

PREFIX 15 characters (Mr., Mrs., Ms., Miss, etc.)
NAME 30 char (lastname, suffix, firstname initial)
(Ex: McGregor, Jr., F. Roger)
(reverse after last comma then drop last comma)
NICK 15 char (Roger or Mrs. Jones, depending if we have first name)
TITLE 40 char (President, Chairman, etc.; blank if home address)
BUS NAME 40 char (ABC Clothing; blank if home address)
AD1 40 char (1313 Bishop Lane)
AD2 40 char
CITY 20 char
ST 2 char
ZIP 5 char
PDAT 8 char (YYMMDD format where 920806 = August 6, 1992)
PBAT 3 char (nnn format where 001 is first batch of 920806's deposit)
PSEQ 2 char (nn format where 22 indicates 22nd check within a batch)
PDOC 6 char (alpha/numeric format giving check number)
PAMT 7 char (where 22.50 indicates \$22.50 and 250 indicates \$250.00)
PEVT 7 char (where SPR indicates "pre-convention team")
END OF RECORD

If you have any questions, call Pat Anderson in Great Falls, Virginia,
at 703/406-0209 or the Washington, D. C., office of Public Office Corporation,
202/675-4900. Please don't hesitate to call.

4011

Tab 04-D.6

Clinton for President

9/17/92

Tape #1 - 2700 records comprising all deposits for 8/17/92
(sent FEDEX to Schuh Advertising, Little Rock)

All tapes in this series are produced using the following specifications:

1600 BPI - EBCDIC - Upper/Lower Case output - fixed length, fixed format

FIXED FORMAT:

PREFIX	15	characters (Mr., Mrs., Ms., Miss, etc.)
NAME	30	char (lastname, suffix, firstname initial) (Ex: McGregor, Jr., F. Roger) (reverse after last comma then drop last comma)
NICK	15	char (Roger or Mrs. Jones, depending if we have first name)
TITLE	40	char (President, Chairman, etc.; blank if home address)
BUS NAME	40	char (ABC Clothing; blank if home address)
AD1	40	char (1313 Bishop Lane)
AD2	40	char
CITY	20	char
ST	2	char
ZIP	5	char
PDAT	8	char (YYMMDD format where 920806 = August 6, 1992)
PBAT	3	char (nnn format where 001 is first batch of 920806's deposit)
PSEQ	2	char (nn format where 22 indicates 22nd check within a batch)
PDOC	6	char (alpha/numeric format giving check number)
PAMT	7	char (where 22.50 indicates \$22.50 and 250 indicates \$250.00)
PEVT	7	char (where SPR indicates "pre-convention team")
END OF RECORD		

If you have any questions, call Pat Anderson in Great Falls, Virginia,
at 703/406-0209 or the Washington, D. C., office of Public Office Corporation,
202/675-4900. Please don't hesitate to call.

only GAO Account deposits

4012

Tab 04 - D.7

Clinton for President

9/17/92

Tape #2 - 1402 records comprising all deposits for 8/18/92 to 9/1/92
(sent FEDEX to Schuh Advertising, Little Rock)

All tapes in this series are produced using the following specifications:

1600 BPI - EBCDIC - Upper/Lower Case output - fixed length, fixed format

FIXED FORMAT:

PREFIX	15	characters (Mr., Mrs., Ms., Miss, etc.)
NAME	30	char (lastname, suffix, firstname initial) (Ex: McGregor, Jr., F. Roger) (reverse after last comma then drop last comma)
NICK	15	char (Roger or Mrs. Jones, depending if we have first name)
TITLE	40	char (President, Chairman, etc.; blank if home address)
BUS NAME	40	char (ABC Clothing; blank if home address)
AD1	40	char (1313 Bishop Lane)
AD2	40	char
CITY	20	char
ST	2	char
ZIP	5	char
PDAT	8	char (YYMMDD format where 920806 = August 6, 1992)
PBAT	3	char (nnn format where 001 is first batch of 920806's deposit)
PSEQ	2	char (nn format where 22 indicates 22nd check within a batch)
PDOC	6	char (alpha/numeric format giving check number)
PAMT	7	char (where 22.50 indicates \$22.50 and 250 indicates \$250.00)
PEVT	7	char (where SPR indicates "pre-convention team")
END OF RECORD		

If you have any questions, call Pat Anderson in Great Falls, Virginia,
at 703/406-0209 or the Washington, D. C., office of Public Office Corporation,
202/675-4900. Please don't hesitate to call.

only GAO Acct

4013

Tab 04 - D.8

BILL CLINTON • AL GORE

December 3, 1992

L. George Ellis
Rt. 2, Box 84
Southland, TX 79364-

Dear George:

Thank you for your generous and continued support throughout the campaign. Without the belief of people like you, we could not have spread our message of change to the American people so successfully. The enthusiasm we witnessed on our bus tours across the nation was exhilarating. We saw a true hunger for change and new leadership. Al and I cannot wait to get started with our plans to energize and lead this country forward.

George, you generously gave \$ 100.00 to the campaign's primary committee. The primary is over and the debt has been retired. Now, federal regulations allow us to use your contribution - with your approval - for only one purpose: the General Election Legal and Accounting Compliance Fund. Today, we ask that you permit us to use these funds to help pay the debt incurred by the flurry of expensive and time consuming legal complaints that have been filed against us since our nomination in July.

The Compliance Fund pays for the legal counsel we must employ to defend ourselves against these suits. Moreover, it pays for the large computer capacity that we have been forced to maintain in order to respond to the accusations and stories that were generated daily by our opposition.

Your previous dedication and loyalty attests to your commitment. We are most grateful. Thank you for your support and confidence.

Sincerely,

Bill Clinton

Bill Clinton

L. George Ellis: Rt. 2, Box 84 , Southland, TX 79364-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1028 in the amount of \$ 100.00, deposited on 11/09/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Date

Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

P.O. BOX 615 • LITTLE ROCK, ARKANSAS 72203 • 501-372-1992 • FAX 501-372-2292

Paid for by the Clinton/Gore '92 Compliance Fund

Contributions to the Clinton/Gore '92 Compliance Fund are not tax deductible.

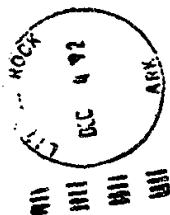
4014

Tab 04
E

99-04-393-1267

BILL CLINTON • AL GORE

P.O. Box 615
Little Rock, AR 72203



REASON FOR RETURN
Unauthorized Return
Address Not Known
Insufficient Address
No Such Office in State
Do not return in this envelope

Paid for by the Clinton/Gore '92 Compliance Fund

Printed on Recycled Paper

4015

Tab 04-

E.O.

**YOUR FIRST CLASS POSTAGE SAVES THE
CAMPAIGN MUCH NEEDED FUNDS!**

COMPLIANCE

BUSINESS REPLY MAIL

FIRST CLASS MAIL

PERMIT NO. 4020

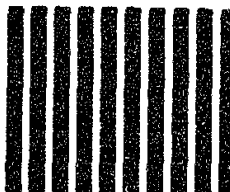
LITTLE ROCK, AR

POSTAGE WILL BE PAID BY ADDRESSEE

CLINTON/GORE '92 COMPLIANCE FUND
NATIONAL HEADQUARTERS
PO BOX 615
LITTLE ROCK, AR 72203-9679



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

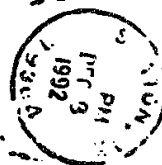


4016

8921 253 40 66



100



4017

5.7

6921-666-40-66

99-04-393-1270

Larry D. Williams
15221 S.W. 148th Avenue
Miami, FL 33187-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4449 in the amount of \$ 10.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Larry D. Williams
Signature

10/5/92
Date

AIRCRAFT MECHANIC
Occupation

NORTHWEST AIRLINES
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

4018

TAB04-F

Rui Olin

Rui

The above are samples of the signature font on
POC's system in Washington, D. C.

A DIFFERENT font was used for the redesignation
letter as shown herein.

4019

Tab 04- G

99.04.393.1271

T FORM

/1137/

3 hours.

100 or more.
signed copy of your
speech.

information on other side.

*Designated
Clinton / Gore
to LR 9/15/92*

X - prepared

LRT

Tape

JOHN M. WILCOX OR
MARCIE B. WILCOX
[REDACTED] 7/15 19 92 1137.
35-106/1130

PAY TO THE ORDER OF Clinton for President \$ 25.00
Twenty five dollars and 00/100 DOLLARS

First Interstate Bank
FIRST INTERSTATE BANK
OF TEXAS, N.A.
ROCKFORD, TEXAS 75087
FOR Clinton / Gore John M. Wilcox

4020

LRT = Little Rock Tape

Tab 04 - H

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5,16579	<LRT>920810	<040>17<3>LRT	20.00	<Lyell, Ruth G.
5,30495	<LRT>920810	<040>18<5>LRT	20.00	<Lyke, Lawrence Allen
5,30496	<LRT>920810	<040>19<3>LRT	20.00	<Mandel, Sydney W.
3, 2491	<LRT>920810	<040>20<8>LRT	30.00	<Melli, Ruthe H.
5,30497	<LRT>920810	<040>21<8>LRT	20.00	<Nielsen, Paul R.
5,30499	<LRT>920810	<040>22<5>LRT	20.00	<Orlin, Sidney T.
5,30500	<LRT>920810	<040>23<3>LRT	30.00	<Perryman, Karen S.
5,30501	<LRT>920810	<040>24<3>LRT	20.00	<Price, Miriam D.
5,30502	<LRT>920810	<040>25<5>LRT	20.00	<Rosenstein, Lya
5,30503	<LRT>920810	<040>26<1>LRT	30.00	<Rous, Emma L.
5,30504	<LRT>920810	<040>27<8>LRT	30.00	<Ruttan, Marilyn M.
5,30505	<LRT>920810	<040>28<6>LRT	35.00	<Schwartz, Irving H.
5,30506	<LRT>920810	<040>29<8>LRT	30.00	<Smith, Gerald
5,30507	<LRT>920810	<040>30<8>LRT	20.00	<Smith, Richard W.
5,30508	<LRT>920810	<040>31<3>LRT	30.00	<Stanley, John R.
5,30509	<LRT>920810	<040>32<3>LRT	30.00	<Wade, John S.
5,30510	<LRT>920810	<040>33<5>LRT	20.00	<Wendt, Dougals
5,30511	<LRT>920810	<040>34<3>LRT	20.00	<White, Lois Ann

-- Page left and this page comprise a contemporaneous (1992) "working list" of miscellaneous contributions which had been custom selected and coded "LRT" (Little Rock Tape).

-- Note that some of the contributions on this tape were received before August 6, 1992; in those cases, the payee on the check was NOT a simple "Clinton for President" and/or there was a notation somewhere on the check about Gore or the general election.

-- Anyway, the LRT Tape was sent to Schuh advertising and redesignation letters were obviously sent to these contributors.

-- Where the contributor's PTSA field is coded 1 or 2, a signed redesignation form was never received back in Little Rock (less than a dozen).

-- Where the contributor's PTSA field is coded other than 1 or 2, indicates a signed redesignation statement was received in Little Rock and the value in the field indicates which redesignation batch that particular contribution was a part of.

4022

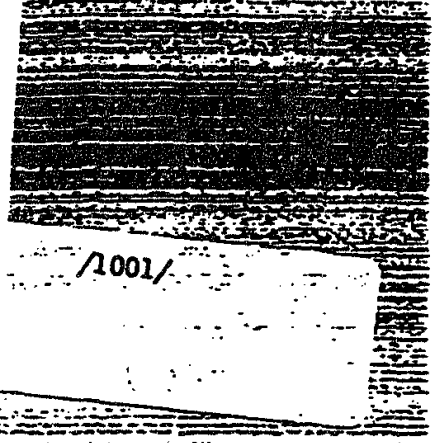
Tabo

H. i

94-04-393-1275

refunded?

Pei's
Caution - these Charles
were part of your may
group - already have
resignation stuff
on them!
for JF



1001/

M

✓

COMMITTEE TO ELECT JOHN SHANNON
PO BOX 6247
COLORADO SPRINGS, CO 80934-6247

1001
82-8/1878

July 16 1992

Pay to the Order of CLINTON FOR PRESIDENT \$ 5.00

FIVE AND NO/100 Dollars



Western Bank Colorado Springs, N.A.
(719) 534-3000
88 South Cascade Avenue
Colorado Springs, Colorado 80903

Memo

Gynthia Frank

⑆107000055⑆ 505 8001583 1001

4023

Tab 04 - I

SCHEDULE B
Operating Expenditures

ITEMIZED DISBURSEMENTS

PAGE 5 OF 5
FOR LINE NUMBER 23

NAME OF COMMITTEE (in Full)
Clinton/Gore '92 General Election Compliance Fund C00268722

Any information copied from such Reports and Statements may not be sold or used by any person for the purposes of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Today's Office 717 West 7th Street Little Rock, AR 72201-	Office supply	09/24/92	\$50.43
	Disbursement for (X)General		
Today's Office 717 West 7th Street Little Rock, AR 72201-	Office supply	09/24/92	\$41.83
	Disbursement for (X)General		
U. S. Postmaster Little Rock, AR 72201-	Ital/Amer. Council Fund.	03/11/92	\$290.00
	Disbursement for (X)General		
U. S. Postmaster Little Rock, AR 72201-	Redesignation Letters	09/16/92	\$10150.00
	Disbursement for (X)General		
U. S. Postmaster Little Rock, AR 72201-	500 Stamps	09/24/92	\$145.00
	Disbursement for (X)General		
U. S. Postmaster Little Rock, AR 72201-	Cash-Flex Postage	09/28/92	\$2600.00
	Disbursement for (X)General		
SUBTOTAL of Disbursements This Page.....			\$13277.26
TOTAL This Period.....			\$753793.57

Page from September 1992 FEC report
of Clinton's GELAC Committee showing
payment to U.S. Postmaster for postage
for Redesignation Letters.

4024

Tab 04 - J

SCHEDULE B
Operating Expenditures

ITEMIZED DISBURSEMENTS

PAGE 3 OF 5
FOR LINE NUMBER 23

NAME OF COMMITTEE (in Full)

Clinton/Gore '92 General Election Compliance Fund C00268722

Any information copied from such Reports and Statements may not be sold or used by any person for the purposes of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Full Name Mailing Address	Purpose of Disbursement	Date MM/DD/YY	Amount
Jonbar Printing 1308 G Street NW Washington, DC 20005-	Printing for Ital/Amer.	09/16/92	\$31.25
	Disbursement for (X)General		
Lathan & Watkins 1001 Pennsylvania Ave. NW Suite Washington, DC 20004-	August Expenses	09/24/92	\$220.25
	Disbursement for (X)General		
Little Rock Muni. Water PO Box 1789 Little Rock, AR 72203-	Utilities - Staff Lodging	09/24/92	\$17.02
	Disbursement for (X)General		
Lloyd Schuh Advertising P.O. Box 3775 1007 W. Seventh Little Rock, AR 72203-	Envelopes	09/24/92	\$211.00
	Disbursement for (X)General		
Lloyd Schuh Advertising P.O. Box 3775 1007 W. Seventh Little Rock, AR 72203-	Paperweight Mailing	09/24/92	\$1165.72
	Disbursement for (X)General		
Lloyd Schuh Advertising P.O. Box 3775 1007 W. Seventh Little Rock, AR 72203-	Redesignation Mailing	09/28/92	\$18043.74
	Disbursement for (X)General		
Lloyd Schuh Advertising P.O. Box 3775 1007 W. Seventh Little Rock, AR 72203-	Redesignation Mailing	09/29/92	\$19469.83
	Disbursement for (X)General		
SUBTOTAL of Disbursements This Page.....			\$39158.81
TOTAL This Period.....			

Page from September 1992 FEC report
of the Clinton GELAC Committee showing
payments to Schuh Advertising for
redesignation mailing.

4025

Tab04-K

3

JOHN R. ROCHE INVESTIGATIONS, INC.

P.O. Box 266
Columbia, Maryland 21045

(410) 893-25
Page (410) 748-50

September 5, 1995

Michael Geltner & Associates
10 "E" Street, S.E.
Washington, D.C. 20003

Re: Public Office Corporation
Clinton 1992 Campaign

Dear Mr. Geltner,

On Wednesday, August 30, 1995, I took a 9:40 AM flight from BWI and eventually arrived 3:40 PM in Little Rock, Arkansas. With my car rental I drove into Little Rock. My preliminary investigation had developed home addresses for both Mr. John Tisdale (305 Crystal Valley Road Little Rock 72205) and Mr. J. L. Rutherford (5604 Hawthorne Road Little Rock 72207). I knew from previous case work Mr. Tisdale was an attorney at Wright Lindsey Jennings. I had called their office and found it a bit uncertain as to what Mr. Tisdale's schedule would be. Regardless, on visit, I found the campaign headquarters (Suite 1150 124 West Capitol Ave. Little Rock) had been closed for about a year.

I walked over to the 200 West Capitol Ave. (the old Worthen Bank Building now Boatmen Bank Building) and sat in the 19 th floor reception area. Mr. Tisdale eventually came out and accepted personal service. He was polite and reviewed the papers in front of me before I left. I would say he was a bit surprised by the suit.

On Thursday morning, August 31, 1995, I traveled to Hot Springs in effort to interview Keeley Ardman. In my conversations with Ms. Anderson it appeared that Ms. Ardman was a key player or most knowledgeable about the "redesignation". Preliminary investigation found the address (216 Central Ave. Hot Springs) was a Pancake Restaurant - Ms. Ardman's employment. I knew Ms. Ardman was scheduled to work here this day. It also turned out Ms. Ardman's mother owned the establishment. When I arrived it was learned that Keeley was out shopping and was expected back. I returned a number of

4026 Tab 04-L 7504

627-363-40-66

times in attempt to interview Ms. Ardman. Eventually her mother supplied me with her home telephone number (501 525 4337). I also found subject's home address to be 101 Long Island Drive Hot Springs 71913.

I could not arrange a personal meeting with Ms. Ardman. She was polite but claimed not to remember anything about Mail Shops, Redesignation, etc... She kept referring me to the campaign's attorney Ms. Utrecht. I did not inform Ms. Ardman about the suit or summons for Ms. Utrecht. At some point Ms. Ardman held a Washington, D.C. position before returning back to Hot Springs. I left Hot Springs at 1:30 PM and drove to the Little Rock Public Library. I did a search on the campaign and any index references to Lloyd Schuh Advertising but found nothing of interest.

I called Lloyd Schuh Advertising and eventually spoke with Scott Schuh. Under pretext Scott stated that the company's name may be misleading. Schuh is a full service firm and has its own "in house" mail shop. Schuh did some mailings and other projects for the 1992 Clinton Campaign. He was familiar with the "redesignation" and said that Schuh also handled this for the campaign. The business and plant location is 1007 West 7 th Street Little Rock, Arkansas 72201. (501 372 6570).

Other calls were made to some campaign related employees who had Little Rock addresses but the few I concentrated on were not reachable or were on Labor Day vacations.

On Friday, September 1, 1995, I took the only flight available 1:40 PM to Jackson, Miss., New Orleans, Pittsburg to Baltimore - arriving at 10:40 PM.

Mr. Prevatt had tried service on Ms. Utrecht but subject seemed to be on vacation - continuing.

7/31/95 Meeting at Public Office.
8/02/95 Discussion with Ms. Anderson

Sincerely,

John R. Roche

Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

September 16, 1992

Clinton for President
Mr. David Watkins
123 West 3rd Street
Little Rock, AR 72201

Statement of Database & FEC Compliance & Matching Services - 09/03 thru 09/16

All charges relate to Primary campaign.

Database management	\$ 1000.00
Key operator support	250.00
Equipment rental	375.00
31590 contributions processed - 5000 @ 2.50	12500.00
26590 @ 1.75	46532.50
1511 affidavits sent @ 2.00	3022.00
5342p listings/reports @ .14	747.88
23803 thanku letters @ discounted rate .26	6188.78
23803 " envelopes " " .12	2856.36
9/08 tape to Schuh	n/c
9/09 " " "	n/c
9/10 " " " 7449 records @ .007	90.00
	52.14
9/11 " " " 4858 " " "	90.00
	34.01
9/14 " " " 6797 " " "	90.00
	47.56
3 magtapes @ 25.00	75.00
	<u>73951.23</u>

n/c 7 Redo + 4

*Amended
9/17/92*

4028

Tab 04 - M

Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

October 21, 1992

Clinton/Gore Committee
Mr. David Watkins
123 West 3rd Street
Little Rock, AR 72201

Services - General Election Legal & Compliance

September 10 thru 17:

Schuh Advertising project:

Processing - 7 magtapes per specs @ 63.00	\$ 441.00
27005 records @ .007	189.03
7 9 track magtapes @ 20.00	<u>140.00</u>
	770.03

4029

Tab 04 **N**

1001-04-393-1281

Important Information for Clinton Pre-Convention Team Members

Under current law, every dollar you contribute up to \$1000 is tax deductible. That means your check could be worth twice the amount you contribute.

920817 040 19

/5756/

n, doll.
o to w.

Federal law requires that we request the following information:

Home Address: 5318 N. Gracewood Ave

Occupation: Physician

Employer: Indiana University School of Medicine

Please make your personal check payable to Clinton for President. Corporate contributions are prohibited by law. Political contributions are not tax deductible.

Bill Clinton
Clinton For President
P.O. Box 8802
Little Rock, AR 72231-8802

Authorized and paid for by the Clinton for President Committee.

Redesignation
List 3

7C. NICKLAUS STEUSSY, JR.
MARTIN L. STEUSSY

INS NATIONAL BANK
INDIANAPOLIS, INDIANA 46206
30-5740

57

7/26/1992

PAY TO THE
ORDER OF

Clinton for President

One Hundred and 00/100.....

DOLLARS

Senator Albert Gore
c/o Clinton for President Com.
Dept. 3215
P.O. Box 8802
Little Rock, AR 72231-8802
political contribution

MEMO

C. N. Steussy

4030

Senator Albert Gore

PREF: Mr.
NAME: Steussy, Jr., C. Nicklaus
NICK: Nicklaus
MORF: M RNUM: 244029 MHH:

SPOU:
MPRE:
MNAM:
MNIC:

PRESIDENTIAL

TSA/D	DAT	BAT	SEQ	AMT	DOC	FEC	AFF	FOR/TYP/EYR	FRC/EVT	SOL
3 OR	08/17/92	040	19	100.00	5756	FDK	NA	G IN 92	DM SPR	NA

MTD\$0.00 TBM\$0.00
Function<Change>?

MWA\$0.00

Pg: 2/4

PYTD\$0.00

Record? steussy,cn

PPTD\$0.00

PGTD\$0.00

View of Steussy Record on POC's system.

TSA value of 3 is code for "Little Rock" List 3"

Example of contribution where payee was Clinton for President and notation of Senator: Albert Gore and Clinton Committee obtained redesignation statement from contributor which was part of redesignation batch "3"

4031

Total - 0.2

CLINTON PRE-CONVENTION TEAM ENROLLMENT FORM

☒ **Yes, Bill!** I want to make sure the American Jewish community and the country of Israel are never again treated as "a nuisance." I want to be part of this crusade for change, so we can get our economy moving again and make our nation one again. Sign me up for the Clinton Team now — while we can still get valuable Federal matching funds that will give us the head start we need to win in November. I'm rushing you my personal check in the amount of:

☐ \$50 ☐ \$75 ☒ \$100 ☐ \$250 ☐ OTHER \$ _____

☐ I've enclosed a check for \$50 or more. Please send me my limited edition Clinton Pre-Convention Team lapel pin.

☒ I've enclosed a check for \$100 or more. Please send me a signed copy of my speech.

MR CHARLES HIRSCHMAN
5008 SOMERVILLE ST
PITTSBURGH, PA 15201-1022

|||||

Please make your personal check payable to:
Clinton for President.

9-15-92

Pat: As per Kelley - -3215010101039

Information on other side.

These should go
on the tape you
are making - the
outliers done OK'd

Thanks
D. Hirschman

2503

CHARLES S. HIRSCHMAN
SHIRLEY HIRSCHMAN

PAY TO THE ORDER OF Clinton for President Committee \$ 100.00

One hundred ⁰⁰/₁₀₀ DOLLARS

Bloomfield Office 99
Mellon Bank
Mellon Bank, N.A.
Pittsburgh, PA

FOR Corporation Store

Charles Hirschman

For - Corporations or Foreign

PREF: Mr.
NAME: Hirschman, Charles S.
NICK: Charles
MORF: M RNUM: 212550 MHH:

SPOU: Hirschman, Shirley
MPRE: Mr. and Mrs.
MNAM: Hirschman, Charles S.
MNIC: Charles and Shirley

PRESIDENTIAL

TSA/D	DAT	BAT	SEQ	AMT	DOC	FEC	AFF	FOR/TYP/EYR	FRC/EVT	SOL
5 OR	07/30/92	038	16	100.00	2503	LRT	TAPE	G IN 92	DM SPR	NA

MTD\$0.00 TBM\$0.00
Function<Change>?

MWA\$0.00
Pg: 2/4

PYTD\$0.00 EPTD\$0.00
Record? hirschman,cs

PGTD\$0.00

View of Hirschman Record on POC's system

TSA value of 5 is code for Little Rock "List 5"

Example of contribution where payee was Clinton for President Committee and a simple notation in comment field on check congratulating Clinton on his choice of Gore; the Clinton Committee obtained a redesignation statement on this contribution which was part of redesignation batch "5"

Note contribution was deposited on 7/30/92, a date which was part of contributions that were submitted for matching funds.

Note the contributor was told to make check payable to "Clinton for President" and was told this contribution was matchable.

4033

Tab 04 - 0.3

99.04.393.1286

921005 001 01

/1446/

(2)

Gore

JOHN W. BELLINGER

1446

PAY TO THE ORDER OF

Clinton/Gore Compliance Fund

Sept 27 1992

05-00 027 921

Fifty

\$ 50.00

First National Bank of Maryland

SALESMAN ACCOUNTING CENTER 1200

DOLLARS 50

FOR Campaign Contribution

John L. Bellinger

E.O.

4034

PREF: Mr.
NAME: Bellinger, John W.
NICK: John
MORF: M RNUM: 20975 MHH: 20975 H

SPOU: McKean, Nancy Anne
MPRE:
MNAM:
MNIC:

PRESIDENTIAL										
TSA/D	DAT	BAT	SEQ	AMT	DOC	FEC	AFF	FOR/TYP/EYR	FRC/EVT	SOL
Y OR	10/05/92	001	01	50.00	1446	FDK	NA	G IN 92	NA NA	NA

MTD\$0.00 TBM\$0.00 MWA\$0.00 PYTD\$0.00 PPTD\$0.00 PGTD\$0.00
Function<Change>? Pg: 2/4 Record? bellinger,jw

View of Bellinger Record on POC system.

TSA value of Y is code for Little Rock "list Y"

This is an example of Clinton Committee's management of contribution of check made payable to Clinton/Gore Compliance Fund and they still obtained a redesignation statement which became part of redesignation batch "Y"

Why get a redesignation on a contribution clearly meant for GELAC? Because this contribution was part of a massive project, they were not looking at individual payees, they were "wholesale" obtaining redesignation statements from contributions deposited between August 6 and the end of the campaign.

4035

Tab 04- 0.4

40.

PREF: Mr.
NAME: Beehan, Thomas
NICK: Tom
MORF: M RNUM: 14323 MHH:

SPOU:
MPRE:
MNAM:
MNIC:

PRESIDENTIAL

TSA/D	DAT	BAT	SEQ	AMT	DOC	FEC	AFF	FOR/TYP/EYR	FRC/EVT	SOL
4 OR	09/02/92	002	03	100.00	2391	FDK	NA	G IN 92	NA NA	NA

MTD\$0.00 TBM\$0.00
Function<Change>?

MWA\$0.00
Pg: 2/4

PYTD\$0.00
Record? beehan,t

PPTD\$0.00

PGTD\$0.00

View of Beehan Record on POC's system

TSA value of 4 is code for Little Rock "List 4"

Example of contribution where payee was Clinton for President with notation for Gore and the Compliance Fund; Clinton Committee obtained a redesignation statement for this contribution which was part of redesignation batch "4"

4037

Tab 04- 0.5

Appendix -

CODE	DESCRIPTION	TO
AXS	130	
BAC	97	
BE	72	
DA	10	
FOR	10	
IN	10	
PI	10	
SXA	10	
TEE	10	
XAS	10	
EEE RD		
EEE RA		

all mixed 9/8
9/5

enc, letter
enc, letter
enc, letter
enc, letter
enc, letter
enc, letter
enc, letter
enc, letter
enc, letter
enc, letter

Tab 04 - P

INTERIM Audit Report

45

provision states that the section had "been revised to state that to receive matching funds after the date of ineligibility, candidates must have net outstanding campaign obligations as of the date of payment rather than the date of submission. Thus, if the candidate's financial position changed between the date of his or her submission for matching funds and the date of payment reducing the candidate's net outstanding campaign obligations, that candidate's entitlement would be reduced accordingly". This revision reinforces the requirement that private contributions received must be applied to obligations prior to the receipt of further matching funds. The 1991 Explanation and Justification for \$9003.3 states that "contributions redesignated must represent funds in excess of any amount needed to pay remaining primary expenses. If this requirement is not met, the committee would have to make a transfer back to the primary account to cover such expenses".

Finally, each edition of the Commission's Financial Control and Compliance Manual For Presidential Primary Candidates Receiving Public Financing, beginning with the first in 1979, has, in some form provided, an explanation and example of the calculation shown above.

It is the opinion of the Audit staff that the Committee's position is inconsistent with the plain meaning of the Commission's Regulations concerning post ineligibility date matching fund entitlement as well as the long established Commission practice and policy.

Recommendation #10

The Audit staff recommends that within 30 calendar days of service of this report, the Committee provide evidence to demonstrate that it did not receive matching funds in excess of entitlement. Absent such a demonstration, the Audit staff will recommend that the Commission make an initial determination that the Committee repay \$3,674,353 to the U.S. Treasury. This amount is subject to change upon further review.

E. Stale Dated Committee Checks

Section 9038.6 of Title 11 of the Code of Federal Regulations states that if the committee has checks outstanding to creditors or contributors that have not been cashed, the committee shall notify the Commission. The committee shall inform the Commission of its efforts to locate the payees, if such efforts have been necessary, and its efforts to encourage the payees to cash the outstanding checks. The committee shall also submit a check for the total amount of such outstanding checks, payable to the United States Treasury.

4039

The Audit staff performed bank reconciliations through June 30, 1993 and determined that the total amount of outstanding

4-Q

INTERIM Audit Report

44

contributions in writing for GELAC pursuant to 11 CFR §110.26/ and the auditors cannot prohibit the Committee from maintaining those contributions in the GELAC.

"The Committee further disagrees with the auditors' method of applying contributions and matching funds to determine when there is no additional entitlement."

With respect to the propriety of the redesignation, 11 C.F.R. §110.1 is not the relevant regulation. That regulation specifies the procedures and time limitations that apply to a redesignation when a redesignation is appropriate. As stated above 11 C.F.R. §9003.3(a)(1)(iii) clearly states that the redesignations pursued by the Committee were not permissible. That section states that only if no remaining primary expenses are to be paid, may primary contributions not in excess of the contributors limit be redesignated to the compliance fund. The definition of remaining primary expenses is clearly stated in 11 C.F.R. §9034.1(b) which speaks to remaining matching fund entitlement. That definition states that remaining net outstanding campaign obligations is the candidate's net outstanding campaign obligations on the date of ineligibility less "the sum of the contributions received on or after the date of ineligibility plus matching funds received on or after the date of ineligibility".

The definition and the calculation of remaining entitlement to which the Committee objects enjoys a long and consistent history in Commission regulation and practice. This interpretation dates to a December 1976 memorandum to the Commission proposing an amendment to then section 134.3(c)(2) of the Commission's regulations. This proposed regulation stated that "a candidate shall be entitled to no further matching funds if, at time of any submission for certification, the total contributions and matching funds received after the ineligibility date equals or exceeds the net obligation outstanding on the date of ineligibility".

The 1979 Explanation and Justification of 11 C.F.R. §9034.1 explains that for candidates who have net outstanding campaign obligations on the date of ineligibility, "[b]asically, these candidates are entitled to payments only if the private contributions received between the date of ineligibility and the date of submission are not sufficient to discharge the net debt". A simplified example of the calculation presented above follows this explanation. Finally, it is explained that the regulation "further the policy that the candidate should use private contributions to discharge campaign obligations wherever possible". The 1983 Explanation and Justification for the same

4040

6/ The Committee claimed that it complied with 11 C.F.R. §110.2. We assume that it meant section 110.1.

4-R

Anderson Report - Tab 5

5001-5023: Documents showing Andersons were generous -- not greedy

False Statement #1 Infers Andersons Are Greedy:

The documents in the previous Tab 4, show that the Andersons did not seek and obtain the redesignation statements as Utrecht asserted in False Statement #1. But False Statement #1 also infers that the Andersons' motive was financial gain. The Andersons find that part of False Statement #1 particularly hurtful, abusive, and malicious in view of the following points:

Point 1: The Andersons never performed any such work and never received any financial gain for performing any such work. The Andersons include in Tab 25 invoices that span POC's services to the Clinton Primary Committee for 1992 and 1993. None of them refer to the massive redesignation project or include items that are not clearly labeled as to exactly what the charge is for.

Point 2: There is evidence Schuh Advertising was paid for the project. The September 1992 GELAC Committee FEC compliance report shows that Schuh Advertising in Little Rock received payments from the GELAC committee for the "Redesignation Mailing" on 9/28/92 for \$18,043.74 and on 9/29/92 for \$19,469.83 (Tab 04, Doc 4025/K). That same FEC report included a payment to the U.S. Postmaster in Little Rock on 9/16/92 in the amount of \$10,150.00 for "Redesignation Letters." (Tab 04, Doc 4024/J) These documents are clear evidence that Schuh Advertising in Little Rock received payments for the redesignation mailing and that postage was purchased by the GELAC committee in Little Rock for the mailing.

Point 3: The incentive to which Utrecht referred in False Statement #1 pertained to additional documentation related to contributions that were submitted for matching funds; the Andersons' contract did not refer in any way to the GELAC (general election legal and compliance fund).

Point 4: During the time Utrecht states POC was inexpertly and greedily obtaining redesignation statements, POC was actually quite busy processing the extraordinarily high volume of primary contributions. The high volume led Bill Anderson, at his own initiative, to fulfill a promise made to the Clinton Primary Committee that he would lower prices if volume permitted. (Tab 05, Doc F & F.2) Bill Anderson lowered prices that meant a net savings to the Clinton Primary Committee in 1992 of more than \$130,000.00. (Tab 05, Doc 5001-14/A, B, C) Further, Document 5022/G in Tab 5 shows where POC waived part of its matching funds incentive.

Point 5: Utrecht was reminded of POC's lowered prices in a letter from Bill Anderson, dated July 9, 1993. (Tab 05, Doc 5017&18/E) POC kept excellent track of its invoices to the Primary Committee and were careful to bill for all work performed, when it was performed. (Tab 05, Doc 5023/H)

The notion that the Andersons were surreptitiously mailing letters to 55,000 Clinton contributors asking them to sign over their primary contribution to the Compliance fund without the knowledge of the Clinton staff in Little Rock, just to run up the bill, would be laughable if such an awful lie hadn't been disseminated throughout the federal-election community as a "fact" in the FEC's final audit report.

Work papers detailing
savings to Clinton Committee
resulting from Doc voluntary
post-contract
price reductions as volume
increased:

1	1676.32
2	80912.97
3	19235.68
4	2233.01
5	820.56
6	3012.36
7	2380.81
8	1158.49

111,434.20

5001

Tab 05 - Doc A

AMT. OF REDUCTION

02/04/92	1809 env. @ .16 via 15.	< 18.09 >
02/13/92	915 est @ .16 via .15	< 9.15 >
	999 env @ .16 via .15	< 9.99 >
02/13/92	2318 est @ .16 via .15	< 23.18 >
	1089 env @ .16 via .15	< 10.89 >
02/13/92	1890 env @ .16 via .15	< 18.90 >
	1210 est @ .16 via .15	< 12.10 >
03/19/92	80.50 step @ 26 via 28.	161.00
	56.25 " @ 22 " 24	117.50
04/03/92	81.00 step @ 26 via 28	162.00
	72.50 " @ 22 via 24	145.00
04/17/92	37.00 step @ 22 via 24	74.00
	71.75 " @ 26 via 28	143.50
	51.00 " @ 22 via 24	102.00
05/04/92	29.00 step @ 22 via 24	58.00
	36.50 " @ 26 via 28	73.00
	49.50 " @ 22 via 24	99.00
05/20/92	19.00 step @ 22 via 24	38.00
	57.75 " @ 26 via 28	109.50
	41.50 " @ 22 via 24	83.00
06/02/92	57.50 " @ 22 via 24	115.00
	24.00 " @ 22 via 24	48.00
06/17/92	14.00 " @ 26 via 28	28.00
	36.50 " @ 22 via 24	73.00
	12.50 " @ 22 via 24	25.00
	85930 lots @ .14 via .15	85.93
	3817 env @ .14 via .15	38.17

07/06/92	42.00 staff @ 26. via 28.	84.00.
	70.50 " @ 22 via 24.	141.00.
	37.25 " @ 22 via 24.	74.50.
	1712 lts @ .14 via .15.	17.12.
07/16/92	6421 contr @ 1.85 via 2.50.	4173.65
	33.00 staff @ 22. via 24	66.00
	11.00 " @ 26 via 28.	22.00
	4763 lwr @ .14 via .15	47.63
	2196 lts @ .14 via .15	21.96.
08/05/92	15479. contr @ 1.85 via 2.50	10061.35
	39.00 staff @ 22 via 24.	78.00.
	15.00 " @ 26 via 28.	30.00.
	3200. staff @ 22 via 24	64.00
	3041 lts @ .14 via .15	20.41
08/18/92	14154 contr @ 1.85 via 2.50	9200.10
	30.50 staff @ 22 via 24.	61.00.
	9583 lts @ .14 via .15	95.83.
	27 parts setup @ 9.00 via 12.	81.00.
	3470 lwr @ .14 via .15	34.70
09/10/92	44058 cont. @ 1.75 via 2.50	33,043.50
	20.00 staff @ 26 via 28.	40.00.
	39.50 " @ 22 via 24	79.00.
	10000 thank u @ 26. via 33	700.00.
	10000 lwr @ .12 via .15.	300.00.
09/17/92	26570 contr @ 1.75 via 2.50	19942.50.
	15342 lts @ .14 via .15	53.42
	23803 thank u @ 26 via 33	1666.21

10/04/92. 10091 Asperme @ 1.00 nie ?

40.00 staff @ 26 nie 28.	800.00
48.00 " @ 22 nie 28	96.00.
44498 there @ .26 nie 33	3114.86.
44498 low @ .12 nie .15.	1334.94
10020 center @ 1.75 nie 250	7515.00.

10/16/92 10091 Asperme @ 0.80 nie ? (1.50 total)

1832 Asperme @ 1.50	
30287 there @ .26 nie 33	2120.09.
30287 low @ .12 nie .15	908.61.
2901 low @ .14 nie .15.	290

11/06/92 23015 Asperme @ 1.53

35070 there @ .26 nie 33	2454.90.
35070 low @ .12 nie .15	1052.10
175 low @ .14 nie .15.	1.75.

11/17/92. 5242 Asperme @ 1.50

22.00 staff @ 22 nie 24	44.00.
38.00 " @ 22 nie 24.	76.00.
12.00 " @ 22 nie 24.	24.00.
1448 low @ .14 nie .15.	14.48
Spec direct a labels	286.05
28.00 staff @ 26 nie 28	56.00.
49.00 staff @ 22. nie 24.	98.00

12/6/1922 293 ~~Am~~ @ 1.50.

25.00 staff @ 26 in 28. 50.00

150.25 " @ 22 in 24. 300.50

1.00 " @ 26 in 28. 2.00

45.50 " @ 22 in 24. 91.00

55.00 s' @ 26 in 28. 110.00

706.00 @ 22 in 24. 412.00

24.00 @ 26 in 28. 48.00

7.00 @ 22 in 24. 14.00

25.00 26 in 28 50.00

23.00 22 in 24. 46.00

12/16/1922 1.50 staff @ 26 in 28. 3.00

15.75 " @ 22 v 24. 31.50

2.00 " @ 26 v 28 4.00

99.75 " @ 22 in 24. 199.50

32.00 " @ 26 v 28. 64.00

184.50 @ 22 v 24 309.00

1.00 " 26 v 28 2.00

81.00 " 22 v 24. 162.00

2.00 26 v 28 4.00

129.25 22 v 24. 258.50

24.00 26 v 28. 48.00

2401 25 @ 14 v 15 24.01

5005

Summed. 2233.01

Tab 05 - A.3

99.04.393.1298

5

01/06/93

20.00 start

26 v 28

40.00

28.00

22 v 24

56.00

41.00

22 v 24

82.00

19.00

26 v 28

38.00

227.75

22 v 24

455.50

2.00

22 v 24

4.00

71.75

22 v 24

143.50

156.25

14 v 15

1.56

Subtotal
820.16

104,877.54 + 30,236 + 2380.31 =

110,270.21

09/22/93	26	s/14	22 v 24	52.00
	188.67	"	26 v 28	377.34
	241.00	"	22 v 24	482.00
	5.00	"	26 v 28	16.00
	16.50	"	22 v 24	33.00
	6.00	"	26 v 28	12.00
	65.25	"	22 v 24	130.50
	2700p	.14 v .15		27.00
	7.50	s/14	22 v 24	15.00
	101.50	"	26 v 28	203.00
03/03/93.	150.25	"	22 v 24	300.50
	8.00	"	26 v 28	16.00
	77.50	"	22 v 24	155.00
	17.00	"	26 v 28	34.00
	70.50	"	22 v 24	141.00
	3.00	"	26 v 28	6.00
	830p	.14 v .15		8.30
	23.00	s/14	22 v 24	46.00
	98.50	"	26 v 28	197.00
	103.00	"	22 v 24	206.00
02/17/93	15.50	"	26 v 28	31.00
	42.50	"	22 v 24	85.00
	2.00	"	22 v 24	4.00
	20.00	"	26 v 28	40.00
	123.00	"	22 v 24	244.00
	71.50	"	26 v 28	23.00
	32.50	"	22 v 24	77.00
	1875	"	22 v 24	37.50
				5007
				2.0.36

Tab 05 - A.4

74. no

116.50

58.00

63.50

10.0

72.00

90.50

38.00

39.00

44.50

21.50

373. 50.

6.15

164. 50

247, 00

4. 50.

201.50

14. 50

21.63

113.00

419.50

26.50

122. συ

43.03

8

04/16/93.	70.00	5/18	26 v 28	140.00
	91.75	"	22 v 24.	183.50
	22.00	"	26 v 28	44.00
	47.00	"	22 v 24.	94.00.
	705p	.14 v .15		7.05.
05/03/93.	99.50	5/18	26 v 28	199.00
	184.50	"	22 v 24.	365.00
	1150p	.14 v .15		11.50
05/17/93	956p	.14 v .15		9.56
	50.75			
06/03/93	11388p	.14 v .15		113.88

Subtotal 1158.89

5009

Tab 05-A.5

001 002 003 004 005 006 007 008 009 010 011 012 013 014 015 016 017 018 019 020 021 022 023 024 025 026 027 028 029 030 031 032 033 034 035 036 037 038 039 040 041 042 043 044 045 046 047 048 049 050 051 052 053 054 055 056 057 058 059 060 061 062 063 064 065 066 067 068 069 070 071 072 073 074 075 076 077 078 079 080 081 082 083 084 085 086 087 088 089 090 091 092 093 094 095 096 097 098 099 100

5010 5010 5010

Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

July 22, 1992

Mr. David Watkins
Clinton for President Committee
123 West 3rd Street
Little Rock, Arkansas 72201

Dear David:

Thank you for your letter of June 30th outlining our role in the General Election campaign.

We are delighted to work as you have outlined.

Regarding our present contributions and matching funds work. You will be glad to hear that due to the heavy volume brought about by direct mail and Clinton popularity we are able to reduce our unit cost by one-quarter (25%) for processing those contributions numbering more than 5000 in a given semi-monthly billing. This is reflected in our bill for first half July services and results in a savings of \$4173. to the Committee. (Similar savings coming).

Your letter says "Since the volume of primary activity will decrease significantly, we will need to renegotiate the fees for filing the monthly primary report". We will be glad to hear what you have in mind. Our feeling is that since almost all of our charges are unit charges based on volume, costs will automatically lower as volume declines.

We do need to address the large and rapidly growing size of the Clinton database. The number of contributions has passed 100,000 and may be headed to nearly double that figure. As this vital database grows so does our responsibility and the amount of work and equipment required to keep it viable and secure and responsive to your needs. Thus, we propose to increase the management fee for this from \$1000. per month to \$2000.

But the foregoing will be offset in part by a reduction in key operator support charge from \$1000. per month to \$500. This we can do because of the quality and experience of your operators.

5011

Tab 05, Doc B

Regarding work in the expenditure area, our charges have been very light - 40% off usual staff-hour rates, with no charge for computer involvement, etc. At a glance, our involvement has amounted to but 25-50 cents per voucher. We are quick to acknowledge that the excellent work and leadership provided by your Little Rock managers is the reason there has not been a need for our involvement to be at all major. (Rates to campaign 26/hr manager; 22/hr others).

As to work in preparation for the audit, we propose that our role be similar to our expenditure role, i.e. that we be paid according to the staff-hours we are called on to provide, at 40% discount.

Separate from your letter you have asked for a quote for integrating general election contributor data into your existing database so that you will have a complete contributions history of each contributor. Since there will not be a matching funds aspect, we can do this for half the rate for primary contributions, i.e. $1/2 \times 2.50$ or 1.25 each. Should the volume be very high, we may be able to cut this rate in fashion similar to that we have done for the primary contributions.

You mentioned consulting. Of course we will be delighted to provide any assistance called upon to do. We have worked hard; we feel very much a part of your campaign team. This is important to us. We want to do our part for a November victory. (Rates same as above.)

Please do not hesitate to call on us whenever we can be of help or whenever any concern might arise about our work.

With best regards.

Sincerely,



Patricia W. Anderson
President

Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

September 10, 1992

Mr. David Watkins
Clinton for President Committee
123 West Third Street
Little Rock, Arkansas 72202

Dear David:

When I wrote to you on July 22nd, I said, "The number of contributions has passed 100,000 and may be headed for nearly double...." I underestimated, for now the figure has passed 200,000 and is headed for around 250,000 when all the compliance work is finished.

I point out these facts for two reasons. First, I am glad to report that the unexpectedly high volume again makes it possible to reduce our unit prices. With the last half of August bill, which you will receive shortly, we are cutting another bit from our per contribution price -- down to \$1.75, as opposed to the \$1.85 per our July reduction and as opposed to the \$2.50 pre-July price. The two reductions result in a savings to the Committee of over \$30,000 for the last half of August alone.

Similarly, we are cutting our price for thankyou letters by another 20%.

We are proud that we can offer these reductions, particularly in light of the huge surge in volume which required us to go to three shifts, seven days, to increase and train staff accordingly, and to buy and install a lot of new hardware.

Second reason to talk about database volume. Being database people, we are probably more sensitive to the care and use of same than most people. Because it was not our work but that of the Committee that brought in the money, I can say without undue bragging that the Clinton Committee has a magnificent database. It is large, it is detailed, and it is accurate. It should be so-maintained.

Thus, without any further charge to the Committee, we are going through a double-check process to seek out and tie down any remaining loose ends. Also, we have recently done a computer-rebuild as a step toward continued efficient functioning of the database. Speed of processing is very important in view of the size and the very large number of requests for products by the Committee and by the DNC.

What else needs to be done? Two things, I suggest, and we will do them with the lowest of costs, if you want us to.

5013

Tab 05, Doc C

We understand that the Committee is anxious to exert an effort to obtain occupation/employer data from contributors who have not yet furnished same. We will be glad to write a nice letter to each such contributor soliciting this information and incorporate the results into the database, if you would like us to.

Next, regarding the results of the effort to reattribute contributions to the general election compliance fund. We suggest that the records of those accepting this option be noted appropriately so that the Committee will have complete contributor data in one central file. We will do this for very low cost if provided a list or tape of the contributions being shifted. In addition to the importance of complete individual data for compliance reasons, the file could be readily useful in case it is unexpectedly necessary to submit additional matching funds requests.

In closing, and as the campaign goes into the home stretch, we want to express our appreciation for the confidence that you and your team have shown in us, and to assure you that we stand ready to help in any way we can toward a big win in November!

Sincerely,

Patricia W. Anderson
President

cc: Keeley Ardman
Patti Reilly

Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

September 10, 1992

Clinton for President
Mr. David Watkins
123 West 3rd Street
Little Rock, AR 72201

Statement of Database & FEC Compliance & Matching Services - 08/18 thru 09/02/92

All charges relate to Primary campaign.

Database management	\$ 1000.00
Key operator support	250.00
Equipment rental	375.00
49058 contributions processed - 5000 @ 2.50	12500.00
44058 @ 1.75	77101.50
Expenditure work for FEC compliance	
20.00 staff-hrs manager @ 26.00	520.00
39.50 " " assistants @ 22.00	869.00
1746 affidavits returned & integrated into submission for	
#10 for \$175,911.65 to be matched @ 2.00	3492.00
10000 thanku letters - @ new discounted rate of .26	2600.00
10000 " envelopes addressed " " " .12	<u>1200.00</u>
	99907.50

5015

Tab 05 - Doc D

5051 565 40 66
99 04 393 1309

200

5016

Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

July 9, 1993

Ms. Lyn Utrecht
Oldaker Ryan and Lewis
Suite 1100
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

Dear Lyn:

This is in reference to our telephone conversation of yesterday.

Devoted to being a "team player", recognizing the sometimes crucial cash flow problems of the Committee, and blessed after the nominating convention with a sizeable increase in work volume, we took two actions at strategically significant times:

- 1) we permitted the balance due from the Committee to rise as high as \$190,846.15
- 2) voluntarily and strictly on our own initiative we reduced prices in several increments with a total savings to the Committee of \$104,178.12

Obviously, the amount of 2) above is thousands of times more than enough to offset the four instances in which you felt there could have been charges for mistakes made on our part. Nevertheless, I will briefly address these four points and should you need further detail I will be glad to provide same.

- 1) issue re: "back-dated" affidavits

If addressed definitively, one would determine what errors were made, when. But since all charges re: affidavit work were on a unit charge basis, there were no charges added for the special handling of those in question.

- 2) issue re: July 1992 report overstated by \$200,000.

We believe this to be the result of a typographical error which was not caught in time to correct before report submission. We regret this. There were no charges for correcting the error.

- more

5017

TAB 5-E

3) "error" re: payments to Worthen National Bank


We believe this stems from the early days where the Committee wrote several checks for deposit in the payroll account, rather than using inter-account transfer. By the time we became involved we believe the practice had been discontinued. We realized, as did the Committee, that care had to be taken on the 4th quarter 1991 report to make sure expenditures were not overstated. The FEC report itself was correct; the "error" was in not making the appropriate "memo" type entry on Schedule B. There were no charges related to this sequence.

4) was the Committee charged twice for any FEC tapes?

No. All tape charges were per Committee requests. Where it was necessary to process tapes more than once, only the final product was charged for.

Trusting that the above will answer your questions, we look forward to receiving the Committee's check for services through June 15, 1993 in the amount of \$26,372.90. Upon receipt of same or word from you that it is enroute we will commence the final work toward the July 15th FEC report.

Sincerely,


William R. Anderson
Chairman

cc
David Watkins
Barbara Yates

P.S. I am enclosing a copy of our July 22 and September 10, 1992 letters to David Watkins. You may not have these; they provide additional detail on our voluntary price reductions. They may also demonstrate the flavor of our efforts to be a team player to the Committee.

PUBLIC
OFFICE
CORPORATION

DATABASE SERVICES
911 SECOND STREET, N.E.
WASHINGTON, D.C. 20002
202-675-4900

FAX Number: 202/675-4911

PLEASE DELIVER THE FOLLOWING 3 PAGE(S)
(including transmittal sheet)

TO: NAME Phil Friedman
COMPANY Ross & Hardies
FAX # [REDACTED]
DOCUMENT DESCRIPTION Proposed Modifications to December
10 Proposal
FROM: William R. Anderson

DATE: Jan 22, 1992 TIME: 3:50 PM

COMMENTS: Phil, the enclosed was FAXed to David Watkins this
morning. If it is approved, we will submit our comments
on the proposed contract promptly. - bill

5019

Tab 5 - F

January 22, 1992

Modifications to December 10, 1991 Proposal for the Clinton for
President Committee

General

- Following a careful analysis of costs, POC has determined that the company is losing money on the Clinton Committee work.
- The loss can be attributed to a combination of factors, including:
 - POC underestimated the staff-hours required.
 - POC is being relied upon for a larger share of responsibility than anticipated.
 - There have been fewer contributions than estimated, but for higher average dollar amounts. This has markedly increased the importance of affidavits, splitting and reattributions, and all the work and follow-up associated with same.
 - Both POC and Committee are placing great stress on optimization of matching funds and accurate and full FEC compliance.
- In order to continue past the FEC submissions now in workup, POC will need a moderate increase in revenue to meet expenses of the project. These increases are detailed in the pages that follow. There are also some decreases due to a lesser number of devices connected at HDQ to POC's system than originally anticipated.
- Should work volume, reallocation of tasks, increases in efficiency or other factors result in a change from meeting expenses to an appreciable profit, we will reduce prices to the meet expense basis.
- Anticipated impact on monthly costs to Committee - based on the number of contributions, affidavits and other jobs for the rather heavy month of December, we estimate that the Committee will see cost increases of about \$5000. per month as compared to current rates. This does not include the "incentive" fees to be charged when and if a FEC grade of 98.00 or above is achieved in a matching funds submission.

5020

TAB-5-F.2



Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

September 24, 1992

Clinton for President Committee
Mr. David Watkins
123 West 3rd Street
Little Rock, AR 72201

Statement of incentive pay for matching submission 10 (of 09/03/92)

Funds left unused in "account" as of 09/01/92 after
S09 billed

\$ 29055.31

Re: S10:
FEC assigned grade of 98.8

68212 contributions processed during month @ 1.00
2643 affidavits sent @ .50

68212.00
1321.50
69533.50

Amount accrued to Clinton Committee for S10 grade over 98.0 =
2,825,181.16 x 0.8%

22601.45

Total now in "account" for incentive pay
(29055.31 + 22601.45)

51656.76

Amount due to be paid from "account" for S10

~~69533.50~~
51656.76

5022

TAB 5 - G

Public Office Corporation

911 Second Street, N.E.
Washington, D.C. 20002
202 675-4900 / Fax 675-4911

April 16, 1993

MEMORANDUM

For: Richard Williams

Re: Balancing of POC invoice totals against Committee disbursements

When we run a total of all invoices thru -
reimbursible expenses thru 10/01 - 10/31/92 period
services thru 02/01 thru 02/15/93 period

We get..... \$ 1052402.74

Your figure of payments... 1039674.27

The difference..... 12728.47 represents our invoice
dated 02/03/93 for services
01/16 thru 01/31/93 which
has not been paid (but
probably included in the
check which is coming).
12728.61 is the amount of that invoice

Thus, we compute a balance within 000.14.

Please advise of anything further needed.

Best regards,

Bill

5023

Tab 5-H

99-04-393-1316

Anderson Report - Tab 6

6002-6100: Batch of redesignation statements used as CPC's first transfer

This section contains a copy of the "batch" of redesignation statements as sent from Little Rock to Pat Anderson at POC in late October 1992. The CPC used this batch as the basis for the first of 15 transfers, all of which correlate to batches of redesignation statements similar to the first one shown herein.

Nevertheless, the CPC's general counsel made the following false and misleading statements to the FEC to help cover up the significance of the redesignation statements and further distance itself from responsibility for obtaining them:

FALSE STATEMENT #2

(from CPC Interim Audit Response, Tab 23, Doc 23041):

"In those instances where they were not totally superfluous the "redesignations" sought and obtained by the Committee's vendor merely serve as confirmation that the contributors intended these contributions to be made to the Compliance Fund since there may have been some ambiguity in the way in which the checks were made out or in the unsigned cards that were attached to the checks."

FALSE STATEMENT #3

(from CPC Interim Audit Response, Doc 23041):

"No funds were transferred to Compliance when the contributor's intent was unclear. The "redesignations" obtained by the Committee's vendor, although redesignation was a misnomer, serve as documentation of the contributors' intent to make contributions to the Compliance Fund. In every instance, the additional clarifying documentation was received within 60 days."

ANDERSON REPLY to False Statements #2 and #3:

Statements #2 and #3 (above) exemplify the Clinton Primary Committee's (CPC) strategy of having it both ways with regard to the redesignation statements. On the one hand, in arguing that the contributions in question were undesignated contributions, the CPC asserts the redesignation statements are superfluous. On the other hand, in arguing that the \$2.4 million in contributions should remain in the Compliance fund (GELAC), the redesignation statements are trotted out to serve as evidence of donative intent, even though, supposedly, the vendor should not have obtained them.

For the moment, consider the CPC's assertions, listed on the following page, which were made to the FEC auditors as regards the signed redesignation statements, the first batch of which is contained herein:

6000

CPC assertion A: that the statements were obtained without its knowledge;

CPC assertion B: that the redesignation statements, though superfluous, confirmed the donor intended to make a contribution to the GELAC;

CPC assertion C: that the contributions shifted to GELAC were not primary assets because "in writing" designation by the contributor did not exist;

CPC assertion D: that the assets deposited in the "suspense account" were NOT primary assets and therefore did not have to be included on its NOCO financial statements when it requested additional matching funds;

CPC assertion E: that the contributions shifted to the GELAC were made based on an "analysis" by the CPC (False Statement #4 discussed in Tab 7); and

CPC assertion F: the contributions shifted to the GELAC were not primary contributions and thus the transfers not a violation of election law.

Now, please flip through the signed statements (Doc 6002-6100) and review the debit and credit slip which was filled out by the Little Rock accounting staff. It is clear these documents:

Refute assertion "A" above; the CPC itself was making transfers based on the signed statements even before the last matching fund payment was paid to it by the FEC; how could Utrecht assert the CPC was unaware of redesignation statements it was using in September 1992 as the basis for transfers of money?

Refute assertion "B" above; the signed statements show the contributor gave FIRST to the primary campaign, and that only 38,000 of approximately 55,000 donors asked to do so, wanted their contribution "redesignated" to the GELAC.

Refute assertion "C" above; the signed redesignation statements are the "in writing" evidence that the contribution was originally intended as a primary contribution.

Refute assertion "D" above; the CPC did violate election law by not reporting all all of its primary campaign assets when requesting additional matching funds.

Refute assertion "E" above; the batch in this section, along with the other documents shown in Tab 14 which are part of the "reconciliation" discussion, prove that the 15 transfers from the primary to the GELAC were made based on batches of redesignation statements -- NOT a convenient analysis performed after the fact.

Refute assertion "F" above; the signed statements prove the CPC transferred primary contributions to the GELAC while CPC had debts, a violation of election law.

It is ironic that the Clinton Primary Committee itself sought and obtained the proof of its own wrongdoing -- documents it had to turn around and coverup by making
6001 false statements.

Checking Account Debit

DATE 9-30-92

We have CHARGED your account for:

AMOUNT

Transfer to DELAC

27,691.51

ACCT. NO. 0086097561X

TOTAL
27,691.51

DO NOT FAIL TO MAKE THIS ENTRY IN YOUR CHECKBOOK

Chito for President
Surplus Acct

Prepared by

Approved by

[Signature]



WORTHEN

NATIONAL BANK
OF ARKANSAS
LITTLE ROCK, ARKANSAS 72203
MEMBER FDIC

DATE 9-30-92

ACCOUNT NUMBER

DEPOSIT TO 00-8607-4351-0

Checks and other items are received for deposit subject to the terms and conditions of this bank's deposit account contract and funds availability policy. All transactions are subject to proof and verification.

NAME Chito for President

ADDRESS DELAC

CHECKING EPOSIT

LIST CHECKS PROPLY OR ATTACH LIST BE SURE EACH ITEM IS RECORDED	CURRENCY	
	COIN	
	CHECKS	
	<u>Transfer</u>	<u>27,691.51</u>
	<u>from</u>	
	<u>Surplus</u>	
	<u>Acct</u>	
	<u>[Signature]</u>	
	TOTAL	
	LESS CASH RECEIVED	
	TOTAL DEPOSIT	<u>27,691.51</u>

DUPLICATE

E

6002

99.04.393.1319

David Greenburg^e
2144 Venetian Way
Winter Park, FL 32789-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2157 in the amount of \$ 50.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

David S. Greenburg
Signature

9/23/92
Date

Computer Engineer
Occupation

Orlando Health Care Group
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Natu R. Patel
2758 Manila
Houston, TX 77043-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #868 in the amount of \$ 30.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Natu R. Patel
Signature

Sept 24 92
Date

CHEMIST
Occupation

EXXON CHEMICAL
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Mary

Mack Peek
R. R. 1 Box 279
Hillsboro., IN 47949-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1470 in the amount of \$ 20.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Mary Peek
Signature

9-24-92
Date

Homemaker
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Mitchell C. Dorson
9183 E. Visco Pl.
Tucson, AZ 85710-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4608 in the amount of \$ 36.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Mitch Dorson
Signature

9/23/92
Date

Director of Education
Occupation

Temple Emanuel - EI
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6004

Larry D. Williams
15221 S.W. 148th Avenue
Miami, FL 33187-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4449 in the amount of \$ 10.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Larry D. Williams
Signature

10/5/92
Date

AIRCRAFT MECHANIC
Occupation

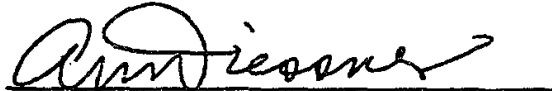
NORTHWEST AIRLINES
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

A. W. Diessner
3193 Pennington Ave.
Afton, MN 55001-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund. X

My contribution of check #4881 in the amount of \$ 300.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.


Signature
MD
Occupation


10/5/92
Date
Self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Herbert L. 1950
19 Avon Place
Arlington, MA 02174-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #913 in the amount of \$ 20.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.


Signature
Occupation


10/7/92
Date
Self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Robert J. Goltin
1145 Jay St.
Boulder, CO 80302-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1884 in the amount of \$ 25.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.


Signature
Lawyer
Occupation

10/4/92
Date
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6006

John Sertic
4133 De Paul Ct.
Sacramento, CA 95821-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #6187 in the amount of \$ 25.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

John Sertic
Signature

Sept 23, 1992
Date

Instructor
Occupation

Los Rios Community College
Employer

District

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Daniel J. O'Friel
PO Box 9662
Santa Fe, NM 87504-9662

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #600 in the amount of \$ 100.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Daniel J. O'Friel
Signature

9/24/92
Date

LAWYER
Occupation

SELF
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Lachen M. Pence
716 Coastland Drive
Palo Alto, CA 94303-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #880 in the amount of \$ 5.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Lachen M. Pence
Signature

9/24/92
Date

Housewife
Occupation

Employer

6007

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Peter O'Reilly
3460 Glen Dr.
Spring Valley, CA 91977-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1164 in the amount of \$ 50.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Peter O'Reilly
Signature

9/23/92
Date

retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Charlotte W. Guice
4901 N. Calle Luisa
Tucson, AZ 85718-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2029 in the amount of \$ 25.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Charlotte W. Guice
Signature

September 23, 1992
Date

retired (Teacher)
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Sara I. Davis
4768 Allied Road
San Diego, CA 92120-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #429 in the amount of \$ 100.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Sara I. Davis
Signature

June 23 Sept 92
Date

Nurse Anesthetist
Occupation

UCSD med. center
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6008

John T. DePalma
56 7th Street #12J
New York, NY 10011-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #554 in the amount of \$ 50.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

John T. DePalma
Signature
Unemployed
Occupation

9-25-92
Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Jeffrey Oppenheimer
201 East 21st Street
New York, NY 10010-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #168 in the amount of \$ 25.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Jeffrey Oppenheimer
Signature
Marketing
Occupation

10-25-92
Date
Karco-Davis Inc.
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Janet K. O'Connell
225 Central Park West Apt. 1205
New York, NY 10024-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1006 in the amount of \$ 100.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Janet K. O'Connell
Signature
Financial Planner
Occupation

9/25/92
Date
Self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6009

Steven P. Sterlekar
2188 Waterbury Road
Lakewood, OH 44107-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #148 in the amount of \$ 27.25, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Steven P. Sterlekar
Signature

9.25.92
Date

STUDENT
Occupation

UNEMPLOYED
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Lillian Holsted
734 S. Woodside Dr.
Vermilion, OH 44089-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #cash in the amount of \$ 20.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Lillian Holsted
Signature

9-24-92
Date

Housewife
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Sylvia Chudy
RT1 Box 299
Bismarck, AR 71929-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #584 in the amount of \$ 20.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Sylvia Chudy
Signature

9/25/92
Date

Media Coordinator
Occupation

Dewan Educational Co-op
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6010

Ralph E. Farmer
4644 Brandon Ct.
Santa Maria, CA 93455-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #mo in the amount of \$ 10.00, deposited on 09/01/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Date

Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Phillip W. Crawford, Jr.
155 E. 29th St., #29E
New York, NY 10016-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #631 in the amount of \$ 100.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Date

Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Augusta L. Packer
420 E 23rd #ME
New York, NY 10010-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #611 in the amount of \$1000.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Date

Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6011

Cathryn S. Guyler
126 E. 24th St.
New York, NY 10010-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3573 in the amount of \$ 200.00, deposited on 09/08/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Cathryn S. Guyler
Signature

9/21/92
Date

Returned Source Material
Occupation

U.S. Dept of HEW
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Jerry Spector
158 S. Formosa Ave.
Los Angeles, CA 90036-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #923 in the amount of \$ 50.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Jerry Spector
Signature

9/24/92
Date

Barista
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Nancy A. Thoennes
3248 S. Franklin
Englewood, CO 80110-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2116 in the amount of \$ 30.00, deposited on 09/01/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Nancy Thoennes
Signature

9-25-92
Date

social research
Occupation

Center for Policy Research
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6012

George H. Short
426 Lewis Center Rd.
Delaware, OH 43015-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #502 in the amount of \$ 100.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

George H. Short
Signature
Retired
Occupation

September 25, 1992
Date
none
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Robert Springer
10244 Bermuda
El Paso, TX 79925-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1654 in the amount of \$ 75.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

R Springer
Signature
Retired
Occupation

25 Sep 92
Date
—
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

June Springer
10244 Bermuda
El Paso, TX 79925-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1653 in the amount of \$ 75.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

June Springer
Signature
RETIRED
Occupation

25 SEP 92
Date
—
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6013

La Vonis Nelson
5267 Torch Lane
Dayton, 45427-

✓ YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #7828 in the amount of \$ 20.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

La Vonis Nelson

Signature

9/25/92

Date

Educator (Teacher)

Occupation

Dayton Public Schools

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Lillian W. Spight and Mr. John H. Spight, Jr.
Box 550 1305 Phil Harper Dr.
Demopolis, AL 36732-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #7123 in the amount of \$ 100.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Lillian W. Spight

Signature

9-24-92

Date

Both Retired

Occupation

Retired

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Steven Nash
5836 Birchbook Dr, #137-A
Dallas, TX 75206-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #351 in the amount of \$ 50.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Steven F Nash

Signature

9/24/92

Date

Pharmacist

Occupation

FLEX RX

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6014

Stephan A. Cole
2 Park St.
Belfast, ME 04915-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2035 in the amount of \$ 25.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Stephan A. Cole
Signature

9-25-92
Date

PLANNER
Occupation

MAINE STATE PLANNING OFFICE
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Elaine H. Stroup
7817 Blackshear Dr.
Huber Heights, OH 45424-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #507 in the amount of \$ 10.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Elaine H. Stroup
Signature
Physical Therapist
Occupation

9-25-92
Date
Retired
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Charles M. Shepard
1670 Huffman Ave.
Dayton, OH 45403-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #210 in the amount of \$ 25.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Charles M. Shepard
Signature
college instructor
Occupation

Sept. 25, 1992
Date
SINCLAIR COMMUNITY COLLEGE
Employer

6015

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Ann C Hevener
40 Foster St
Littleton, MA 01460-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2129 in the amount of \$ 50.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ann C Hevener
Signature

9-25-92
Date

Illustrator and Writer
Occupation

self-employed
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Fred Pearson
16 Crest Rd.
Wayland, MA 01778-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1632 in the amount of \$ 25.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Fred Pearson
Signature
Scientist
Occupation

September 26, 1992
Date
MIT / Lincoln Laboratory
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Dorothy S. Tate
710 Gatewood Avenue
High Point, NC ~~27305~~ 27262

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4245 in the amount of \$ 250.00, deposited on 09/01/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Dorothy S. Tate
Signature
Office Manager
Occupation

September 25, 1992
Date
C. Richard Tate, Jr., Attorney
Employer
at Law

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount. P.O. Box 27
High Point NC
27261

6016

Robert E. Stebbins
208 College View Drive
Richmond, KY 40475-2404

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1011 in the amount of \$ 100.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Robert E. Stebbins

Signature

9/25/92

Date

Professor

Occupation

Eastern Kentucky Univ.

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Jeffrey P. Hoyle
56 Lockwood Circle
Swansea, MA 02777-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4979 in the amount of \$ 10.00, deposited on 09/08/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Jeffrey P. Hoyle

Signature

9/25/92

Date

Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Agatha Vinson
Box 137
Sutter, IL 62373-

*This contribution may be used the same
if you choose to*

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #137 in the amount of \$ 10.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Agatha Vinson

Signature

Sept. 26, 1992

Date

Semi-Retired Farm Worker

Occupation

Self

Employer

6017

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Laurence Spitters, Jr.
97 E. St. James #22
San Jose, CA 95112-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1655 in the amount of \$ 100.00, deposited on 09/01/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Laurence Spitters
Signature

9/24/92
Date

ATTORNEY
Occupation

GASSETT, PERRY & FRANK
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Betty J. DeWitt
325 Northridge Drive
Scotts Valley, CA 95066-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #472 in the amount of \$ 35.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Betty J. DeWitt
Signature

September 24, 1992
Date

Retired
Occupation

-
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Fran Hanchett
100 Lockewood #138
Scotts Valley, CA 95066-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #498 in the amount of \$ 100.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Fran Hanchett
Signature

9/29/92
Date

-
Occupation

(retired) 6019
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Beverly Solomon
582 Jobel Dr.
Haddonfield, NJ 08033-

YES. I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1868 in the amount of \$ 30.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Beverly H. Solomon
Signature

Sept. 25, 1992
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6019

Donald D. Clouse
1717 S. Smithville Rd.
Dayton, OH 45410-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1724 in the amount of \$ 20.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Donald D. Clouse
Signature

Sept 24, 1992
Date

Disability from 1989
Occupation *none*

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Fern C. Haaland
1701 E. 128th St.
Tacoma, WA 98445-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #8858 in the amount of \$ 15.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Fern C. Haaland
Signature

9-25-92
Date

Retired teacher
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Robert W. Morrison
P. O. Box 378
Mahomet,, IL 61853-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5271 in the amount of \$ 25.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Robert W. Morrison
Signature

26 Sept 92
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6020

Russell D. Chase
26 Clover Street
South Burlington, VT 05403-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #8458 in the amount of \$ 50.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Russell D. Chase
Signature
Retired
Occupation

Sept 26 1992
Date
Former IBM, Retired
Employer
may. USAF

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Lisa Castrignano
Springfield, VT 05156-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #637 in the amount of \$ 75.00, deposited on 09/03/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Lisa Castrignano
Signature
Office Manager
Occupation

9/25/92
Date
Self-employed
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Donette J. Johnson
907 Parkway Dr.
Ballwin, MO 63011-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2791 in the amount of \$ 25.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Donette Johnson
Signature
Finance/Personnel Officer
Occupation

9/25/92
Date
City of Ballwin
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6021

Harlan M. Greene
2015 Markham Dr.
Chapel Hill, NC 27514-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1010 in the amount of \$ 60.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Harlan M. Greene
Signature

28 Sept 92
Date

Accountant
Occupation

NC Precinct Commission
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Betsy Hodges Sterman
3245 Worthington St., NW
Washington, DC 20015-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #392 in the amount of \$ 200.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Betsy H. Sterman
Signature

9/25/92
Date

housewife
Occupation

none
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Victor Shimkin
184 Adams St.
Delmar, NY 12054-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2551 in the amount of \$ 25.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Victor Shimkin
Signature

September 24, 1992
Date

Project Manager
Occupation

NYS Division of Housing
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6022

Paul Neal
325 Deauville Dr.
Monroeville, PA 15146-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #281 in the amount of \$ 100.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Paul Neal
Signature

9/25/92
Date

Engineer
Occupation

Self Employed
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Betty Jean Sonnie
131 O'Hara Street
Greensburg, PA 15601-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #0285 in the amount of \$ 50.00, deposited on 09/01/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Betty Jean Sonnie
Signature

Sept 26, 1992
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Jack Delman
302 Burnt Mills
Silver Spring, MD 20901-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #509 in the amount of \$ 100.00, deposited on 09/08/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Jack Delman
Signature

25 Oct 92
Date

Administrative Judge
Occupation

Armed Services Board Contract Appeals
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6023

Karl W. Stevenson
2609 N Duke St., Ste. 103
Durham, NC 27704-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4354 in the amount of \$ 100.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Karl W. Stevenson, MD
Signature
Physician
Occupation

9/21/92
Date
SA
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Alta L. Keefe
644 Penning Ave.
Wood River, IL 62095-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5573 in the amount of \$ 25.00, deposited on 09/03/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Alta L. Keefe
Signature
Housewife
Occupation

9-25-92
Date
Student
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Scott R. Parsons
2314 Wilson St.
Durham, NC 27705-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1007 in the amount of \$ 20.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Scott R. Parsons
Signature
Student
Occupation

9/23/92
Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6024

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4350 in the amount of \$1,000.00, deposited on 9/1/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Clyton Huggatt
Signature

9/17/92
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #203 in the amount of \$500.00, deposited on 9/1/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Sadie Oppen
Signature

Sept 10/92
Date

Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Margaret Parker
1010 Highland Woods
Chapel Hill, NC 27514-

③ Thank you, Thank you for your
optimism, dedication, and wisdom.
Carry on. We Parkers are all behind you

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #11248 in the amount of \$ 500.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Margaret P. Parker
Signature

9/23/92
Date

Volunteer - Family Literacy
Occupation

Orange County Literacy Council
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Fred E. House
22 Lyric Lane
Little Rock, AR 72205-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2266 in the amount of \$ 100.00, deposited on 09/03/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Fred E. House
Signature
(Retired)
Occupation

9-23-92
Date
(None)
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Martha Parrott
53 Serenada Lane
Shawnee, OK 74801-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1319 in the amount of \$ 30.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Martha Parrott
Signature
QUALITY CONTROL TECHNICIAN
Occupation

9.23.92
Date
NATIONAL STANDARD CO.
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Pearl F. Daniel
P.O. Box 939
Marshall, AR 72650-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1111 in the amount of \$ 155.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Pearl F. Daniel
Signature
Retired
Occupation

9/22/92
Date
✓
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6026

Ann W. Newton
509 E. Jefferson
Effingham, IL 62401

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1132 in the amount of \$ 10.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ann W. Newton
Signature
Teacher
Occupation

September 23, 1992
Date
Eff Comm Unit #40
Employer 1000 W. Grove
Eff, Illinois 62401

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Stephen H. Hanna
3205 South 51 St.
Fort Smith, AR 72903-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3746 in the amount of \$ 25.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Stephen H. Hanna
Signature
Sales Rep
Occupation

9-23-92
Date
J.A. Reitz Tractor Co
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Robert Clemenz
4011 Laurel Street
New Orleans, LA 70115-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1304 in the amount of \$ 10.00, deposited on 09/03/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Robert Clemenz
Signature
Unemployed
Occupation

9-23-92
Date
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6027

Charles L. Cranford
1023 S. Church St. Apt. C
Asheboro, NC 27203-

☒ YES I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #9246 in the amount of \$ 20.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Charles L. Cranford
Signature
Retired Textile Supervisor
Occupation

9/23/92
Date
Burlington Industries
Employer
now retired

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Shea Crain
517 Hawthorne
Fayetteville, AR 72701-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #7715 in the amount of \$ 100.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Shea Crain
Signature
Cable Administrator
Occupation

9-22-92
Date
City of Fayetteville
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Frances O. Nixon
44 Robinwood Dr.
Little Rock, AR 72207-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #976 in the amount of \$ 100.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Frances O. Nixon
Signature
Volunteer
Occupation

9/24/92
Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

G.F. Sherman
Rt. 2 Box 311 D
Brinkley, AR 72021-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #cash in the amount of \$ 5.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

G.F. Sherman
Signature

9-24-92
Date

S.S. Disabled
Occupation

Use to be self employed
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Bobby L. Padgett, II
43 Beech Ct.
Littleton, NC 27850-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #629 in the amount of \$ 10.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Bobby L. Padgett, II
Signature

9-23-92
Date

Unemployed
Occupation

Subor Int'l. L+P
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #13269 in the amount of \$1,000.00, deposited on 9/1/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Louis C. Blau
Signature

9/16/92
Date

Attorney - Retired
Occupation

None
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Louis C. Blau

6029

Gerhard Wiesner
313 Eleanor
Atlanta, TX 75551-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3709 in the amount of \$ 50.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Gerhard Wiesner

Signature

09-25-92

Date

ELECTRICIAN

Occupation

SEIT

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Charles Carlton Oldham
4521 Fox Run Rd
Louisville, KY 40207-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #0568 in the amount of \$ 100.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Charles Carlton Oldham

Signature

Sept 23, 1992

Date

Retired

Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Ezra T. Keathley
8523 West 34th
Little Rock, AR 72204-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #0432 in the amount of \$ 60.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ezra T. Keathley

Signature

9-25-92

Date

6030

Retired

Occupation

Aluminum Co of America

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Timothy D. Sublett
5900 NW Red Haw Lane
Platte Woods,, MO 64151-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2095 in the amount of \$ 10.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Date

Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Gene Winters
3813 Adams
Independence, MO 64055-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1535 in the amount of \$ 20.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Date

Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Joseph W. Janson
4831 Jarboe St.
Kansas City, MO 64112-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1264 in the amount of \$ 25.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Date

Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6031

Forrest W. Hensley
1700 S. Jersey
Muncie,, IN 47302-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #203 in the amount of \$ 40.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Forrest W. Hensley
Signature

9/25/92
Date

Repairman
Occupation

Indiana Bell Telephone
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Thomas M. Sheehan
19054 Fremont Avenue N
Seattle, WA 98133-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5392 in the amount of \$ 25.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Thomas M. Sheehan
Signature

9/24/92
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Edward C. Hamilton-TTEE
5440 NO Ocean Drive
Riviera Beach, FL 33404-2530

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #104 in the amount of \$ 50.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Edward C. Hamilton TRUSTEE
Signature

9-26-92
Date

RETIRED
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6032

Marilyn H. Symonds
101 Brairwood
Stephenville, TX 76401-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #348 in the amount of \$ 100.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Marilyn H. Symonds
Signature

9-26-92
Date

Atty.
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Mrs. Kelroy Chadwick
2924 Harlanwood Dr.
Fort Worth, TX 76109-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4718 in the amount of \$ 50.00, deposited on 09/08/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Mrs. Kelroy Chadwick
Signature

9-25-92
Date

Real Estate Investments
Occupation

Self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Eamon T. O'Sullivan
34 Tacoma St.
Springfield, MA 01104-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2322 in the amount of \$ 25.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Eamon T. O'Sullivan
Signature

Sept 24 1992
Date

Education - Political
Occupation

James Mess. Dept. Education
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6033

Michael D. Haney
924 Roaring Springs Road
Fort Worth, TX 76114-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1042 in the amount of \$ 100.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Michael D. Haney
Signature

September 26, 1992
Date

EXECUTIVE
Occupation

ELECTRO Cam Automation
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Tom Chancellor
2932 6th Avenue
Fort Worth, TX 76110-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1583 in the amount of \$ 100.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Tom Chancellor
Signature

9/25/92
Date

Social Work
Occupation

self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Josef Nathanson
124 W. Lafayette Avenue
Baltimore, MD 21217-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4969 in the amount of \$ 25.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Josef Nathanson
Signature

9/25/92
Date

REGIONAL PLANNER /
ECONOMIST
Occupation

BALTIMORE METROPOLITAN COVA
Employer

6034

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Denise F. Timmons
4324 N. 27th St.
Fort Smith, AR 72904-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #126 in the amount of \$ 500.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Denise F. Timmons
Signature

9. 26. 92
Date

None
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

William B. Karstetter
9007 S. Glasford Blvd.
Glasford, IL 61533-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5321 in the amount of \$ 10.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

William B Karstetter
Signature

9/25/92
Date

RETIRED POSTMASTER
Occupation

Employer

FOR SIGNATURE OF POSTMASTER

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

SEE REVERSE

Ernest M. Stolberg
902 Barebranch Ct.
Baltimore, MD 21208-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2698 in the amount of \$ 10.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ernest M. Stolberg
Signature

September 26, 1992
Date

Retired Energy + Environmental Engineer
Occupation

Retired
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6035

Lila W. Stewart
212 Robbins Rd.
New Albany, MS 38652-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2319 in the amount of \$ 25.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Lila W. Stewart
Signature

9-24-92
Date

Teacher / Counselor
Occupation

Retired N.E. City Schools
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Danielle Nyman
619 Jones Road
Englewood, NJ 07631-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #207 in the amount of \$ 100.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Danielle Nyman
Signature

9/23/94
Date

Teacher Trainer
Occupation

Ethical Culture Schools
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Johanna M. Gregersen
8191 Warren Blvd.
Center Line, MI 48015-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3088 in the amount of \$ 25.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Johanna M. Gregersen
Signature
Homemaker
Occupation

Sept. 24, 1992
Date
Employer

6036

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

William B. Davisson
322 Hanover Ave #508
Oakland, CA 94606-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #454 in the amount of \$ 100.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

William B. Davisson
Signature

September 23, 1992
Date

Sales
Occupation

More Business Communication Services
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Thomas L. Clark & Annie R. Clark, tal
113 Brazos
Seguin, TX 78155-
Bill Clinton I will give this money and also what we need for this week (\$30.00) I want to support the Democratic Party 11070 Tommy Clark

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4196 in the amount of \$ 10.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Thomas L. Clark
Signature

9-23-92
Date

Retired Letter Carrier
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

James M. Scaggs
2519 Forest Home Rd. Unit 23
Jonesboro, AR 72401-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3486 in the amount of \$ 25.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

James M. Scaggs
Signature
RETIRED
Occupation

9-26-92
Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6037

Daniel M. Pallotta
1318 N Mansfield Ave #303
Hollywood,, CA 90028-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1214 in the amount of \$ 20.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.



Signature

Date

09-24-92

FUND RAISING CONSULTANT

Occupation

Employer

Self

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Dorothy M. Dixon
5 Silver Spring Rd.
Rolling Hills Estate, CA 90274-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3427 in the amount of \$ 25.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.



Signature

Sept. 23, 1992

Date

Retired high school teacher

Occupation

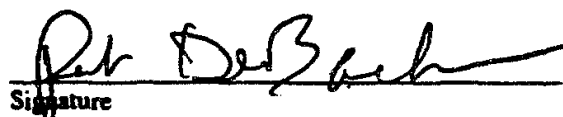
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Patrick DeBacker
1455 N. Pnderosa Ave.
Brea, CA 92621-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1084 in the amount of \$ 25.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.



Signature

Date

9/23/92

TEACHER

Occupation

FUTSD - Fullerton, CA

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6038

Charlotte Shearer
11666 Montana #303
Los Angeles, CA 90049

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #360 in the amount of \$ 50.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Charlotte B Shearer
Signature
Retired
Occupation

Sept 24, 1992
Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

John L. Hogg
3550 Wilshire Blvd. Ste. 1250
Los Angeles, CA 90010-2413

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1502 in the amount of \$ 500.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

[Signature]
Signature
Attorney
Occupation

9-24-92
Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Sheila T. Davis
7913 Vantage Ave.
North Hollywood, CA 91605-2411

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #6418 in the amount of \$ 25.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Sheila Teale Davis
Signature
Secretary
Occupation

9/24/92
Date
6039
Bob Tzedek Legal Services
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Regina Dansker
115 Jersey St
Harrison,, NJ 07029-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #298 in the amount of \$ 100.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Regina Dansker
Signature

Sept. 23, 1992
Date

Retired Teacher
Occupation

Bd. of Ed. Chatham Twp., N.J. 07928
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Gregory M. Cooper
17 Fairview Ave. #4
South Orange, NJ 07079-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #260 in the amount of \$ 10.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Gregory M. Cooper
Signature
ASSISTANT UNDERWRITER
Occupation

9/23/92
Date
SKANDIA AMERICA REINSURANCE
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Frank Miller
6657 Emmet Terrace
Los Angeles, CA 90068-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1231 in the amount of \$ 500.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

[Signature]
Signature
CARTOONIST
Occupation

9/24/92
Date
SELF
Employer

6040

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Vivian G. Reed
15650 Regal Hill
Dallas, TX 75248-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3782 in the amount of \$ 25.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Vivian G. Reed
Signature

9/26/92
Date

RN
Occupation

St Paul Medical Center
Employer
Dallas, Tx.

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Erika Von Deutsch
65 Fraser Dr.
Walnut Creek, CA 94596-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1623 in the amount of \$ 20.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Erika von Deutsch
Signature

9-23-92
Date

Library Assistant
Occupation

Contra Costa County Library
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Marlene Griffith
25 Stonewall Rd.
Berkeley, CA 94705-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #158 in the amount of \$ 10.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Marlene Griffith
Signature

9/24/92
Date

Relieved
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6041

Betty J. Norman
4250 N. Marine Dr.
Chicago, IL 60613-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3482 in the amount of \$ 25.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Betty J. Norman
Signature
Clerk
Occupation

September 24, 1992
Date
Federal Milk Market Administrator
Employer
U.S.D.A.

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

L. Myers Lurette
266 Marion Rd. Merion
Dover, DE 19901-2325

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #CASH in the amount of \$ 10.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ms Lurette Myers
Signature
Clerk
Occupation

24 Sept 92
Date
Non-Appropriated Fund US
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Eugene Cotton
5050 S. Lake Shore Dr. #2314
Chicago, IL 60615-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #906 in the amount of \$ 25.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Eugene Cotton
Signature
Lawyer
Occupation

9/24/92
Date
Self
Employer
6042

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Thomas W. Murray
3615 Woodhaven Ct.
Woodbridge, VA 22192-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1266 in the amount of \$ 50.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Thomas W. Murray
Signature

9-24-92
Date

Hair Salon Manager
Occupation

A Visual Difference, Ltd.
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Diane B. Greenlee
4115 N. 34th Street
Arlington, VA 22207-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3039 in the amount of \$ 50.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Diane B. Greenlee
Signature

9/24/92
Date

MOM
Occupation

my kids
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Ann M. Stirling
664 Old Plantation Road
Charleston, SC 29412-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #729 in the amount of \$ 100.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ann M. Stirling
Signature

9/24/92
Date

Attorney
Occupation

Self
Employer

6043

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Fred Gusz
Box 31
West Chester, PA 19381-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #263 in the amount of \$ 5.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Occupation

Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

John M. Hogg
537 Madison St.
Albany, CA 94706-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #0753 in the amount of \$ 50.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Occupation

Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Jon D. Peterson
4142 Reinhardt Dr. (510)
Oakland, CA 94619-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3104 in the amount of \$ 500.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Occupation

Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6044

George E. Crane
1852 Bret Harte St.
Palo Alto, CA 94303-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3222 in the amount of \$ 250.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

George E. Crane
Signature

25 Sept 1992
Date

Retired Mathematician
Occupation

Lockheed Missiles & Space Co.
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Anne S. Dantzig
821 Tolman Dr.
Stanford, CA 94305-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4458 in the amount of \$ 25.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Anne S. Dantzig
Signature

Sept. 25 1992
Date

Mathematician
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Jane E. Heller
5705 Holton Ln.
Temple Hills, MD 20748-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #0235 in the amount of \$ 35.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Jane E. Heller
Signature

9/24/92
Date

Construction Inspector
Occupation

ESA ENGINEERING
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #259 in the amount of \$ 20.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Sheldon H. Muller
Signature

Sept. 23, 1992
Date

Attorney
Occupation

EPA
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

David M. Cohen
140 N. Las Palmas
Las Angeles., CA 90004-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4626 in the amount of \$1000.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

[Signature]
Signature

Accountant
Occupation

9-22-92
Date

Self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

James L. Davis
P. O. Box 9452 Elmora Station
Elizabeth., NJ 07202-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1099 in the amount of \$ 5.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

James L. Davis
Signature

draftsman
Occupation

9-24-92
Date

AAI Woodwork Inc., Elizabeth N.
Employer

6046

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Ruth Gutstein
4720 Gifford Blvd.
Orlando, FL 32821-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1315 in the amount of \$ 10.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ruth Gutstein
Signature

9/25/92
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Kathy H. Groth
2108 S. Joliet Ct.
Aurora, CO 80014-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5771 in the amount of \$ 50.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Kathy H. Groth
Signature

Sept 24, 1992
Date

Homeowner, Community
Activist
Occupation

Self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

David C. Nelson
855 Hamilton Ave.
Palo Alto, CA 94301-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #820 in the amount of \$ 75.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

David C. Nelson
Signature

9/24/92
Date

Consultant
Occupation

Self
Employer

6047

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Donna M. Pedone
B5 Yorkville MNR.
Yorkville, NY 13495-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3318 in the amount of \$ 50.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Donna M. Pedone
Signature

Legal Secretary
Occupation

September 24, 1992
Date

Richard J. LaFache, Atty.
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Richard P. Crisa
17701 S. Avalon Blvd, #190
Carson, CA 90746-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #843 in the amount of \$ 25.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Richard P. Crisa
Signature

Administrator
Occupation

9-23-92
Date

ACE 5/ILCO Tube Bending
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Lynne H. Dotson
56 Los Altos Ave.
Los Altos, CA 94022-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5329 in the amount of \$ 30.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Lynne Dotson
Signature

UNIV. ADMINISTRATOR
Occupation

9/25/92
Date

STANFORD UNIV.
Employer

6048

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Phyllis Evans
1901 Atlanta
Fort Smith, AR 72901-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check # in the amount of \$ 300.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Phyllis Evans
Signature

9-25-92
Date

Bookkeeper
Occupation

Evans Distributing Co.
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6043

Jim W. Holes
202 Roosevelt E.
Enumclaw, WA 98022-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #6347 in the amount of \$ 50.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Occupation

Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Simon S. Davidson
8707 143rd Ave Ct. E
Puyallup, WA 98372-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1023 in the amount of \$ 20.00, deposited on 09/03/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Occupation

Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Todd E. Morrow
6221 Second Dr. SE
Everett, WA 98203-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1970 in the amount of \$ 25.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Occupation

Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Beatrice Kabler
6442 Chevy Chase Avenue
Dallas, TX 75225-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #547 in the amount of \$ 30.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Beatrice Kabler
Signature

9-25-92
Date

Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Lawrence Schroeder
2048 Briar Hill
Schaumburg, IL 60194-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #224 in the amount of \$ 100.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Lawrence A. Schroeder
Signature

9-25-92
Date

LETTER CARRIER
Occupation

US POSTAL SERVICE
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Dougals L. Moore
3327 -25th Ave. S.
Seattle, WA 98144-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1419 in the amount of \$ 100.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Dougals L. Moore
Signature

9-26-92
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6051

Charles A. Ferry
1008 E. Redfield Rd.
Tempe, AZ. 85283-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5649 in the amount of \$ 40.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Charles A. Ferry
Signature

Sept 26, 1992
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Leona N. Miller
1037 S. Scallop Dr.
Gilbert, AZ 85234-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1790 in the amount of \$ 50.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Leona N. Miller
Signature

9-25-92
Date

Retired Teacher
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Alex C. Schumacher
8300 Skillman NO 210
Dallas, TX 75231-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #0646 in the amount of \$ 25.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Alex C. Schumacher
Signature

9-25-92
Date

Retired CPA
Occupation

Ernst & Young
Employer

6052

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Won Gin Ng
6305 Mirror Lake Drive
Los Angeles, CA 90068-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2094 in the amount of \$ 50.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Won Gin Ng
Signature

September 24, 1992
Date

Associate professor
Occupation

USC
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Ernest G. Cramer
444 S. Higley Rd. No. 128
Mesa, AZ 85206

→ N.B. new address! →

Ernest G. Cramer
164 N. 74th St., Apt. 1080
Mesa, Az. 85207

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #830 in the amount of \$ 30.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ernest G. Cramer
Signature
retired
Occupation

Sept. 25, 1992
Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

5. Please send another package to our new address - the same package we just received containing buttons, stickers, pamphlets, envelopes, etc. We can use all this material!

Bernard Kostetsky
1613 Hillwood Drive
Mesquite, TX 75149-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5762 in the amount of \$ 20.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Bernard Kostetsky
Signature
Part-time Telemarketing
Occupation

9/26/92
Date
ABAR Heating & Air Conditioning
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6053

Ada Hollis
1015 E. 78th St.
Los Angeles, CA 90001-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check # in the amount of \$ 50.00, deposited on 09/08/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ada Hollis
Signature

Sept 24, 1992
Date

none was a nurse
Occupation

Retired
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

George Haydel
1582 W. 46th St.
Los Angeles, CA 90062-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3381 in the amount of \$ 25.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

George H. Haydel
Signature
Retired
Occupation

Sept - 25 - 1992
Date
past office employee
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Earl Siegel
2748 Anchor Ave.
Los Angeles, CA 90064-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4635 in the amount of \$ 50.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Earl Siegel
Signature
RETIRED
Occupation

September 25, 1992
Date
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6051

Gregory A. Dobie
816 N. Hayworth Ave. #1
Los Angeles, CA 90046-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #0849 in the amount of \$ 100.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Gregory A. Dobie
Signature
Editor / Teacher
Occupation

9-25-92
Date
L.A. County Museum of Art / L.A.
Employer
Un. Fed. Sch. District

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Helen Hoskins
5454 Arlington Rd.
Jacksonville, FL 32211-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #184-K in the amount of \$ 30.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Helen S. Hoskins
Signature
Piano Teacher
Occupation

Sept 25, 1992
Date
Self
Employer

ALSO, HEREWITH A NEW CHECK, NO. M-207, \$300.00 FOR USE
I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.
IN THE SAME FUND. Wm. B. Hoskins, COMPOSER/SYNTHESIST,
SELF EMPLOYED, SEPT. 25, 1992

Robert M. Nied
2348 Smullian Tr. N.
Jacksonville, FL 32217-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #8098 in the amount of \$ 150.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Robert M. Nied
Signature
Junior
Occupation

9/26/92
Date
None
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6055

William Phelps
5353 W 3rd St
Los Angeles,, CA 90020-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #954 in the amount of \$ 250.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

William Phelps
Signature
Professor
Occupation

9/25/92
Date
Whittier Law School
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Howard G. Perry
6029 Carlton Way
Los Angeles, CA 90028-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #162 in the amount of \$ 25.00, deposited on 09/01/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Howard G. Perry
Signature
Miscellaneous
Occupation
9-24-92
Date
Self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Laura Owen
11357 Waterford St.
Los Angeles, CA 90049-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2349 in the amount of \$ 20.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Laura Owen
Signature
Retail Mgr.
Occupation

9/25/92
Date
"Eugenia", Santa Monica, CA
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6056

Dwain Cromwell
335 Baxter Lane
Fayetteville, AR 72701-2106

Mr. & Mrs. DWAIN CROMWELL

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4055 in the amount of \$ 20.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Dwain Cromwell
Signature
University Admin.
Occupation

9/22/92
Date
Univ of Ark.
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Eileen Mary Dargen
1 Sueca Place
Hot Springs Village, AR 71909-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #959 in the amount of \$ 5.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Eileen Mary Dargen
Signature
Retired Discharged Teacher
Occupation

Sept. 22, 1992
Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

John S. Denney, Jr.
P.O. Box 22865
Little Rock, AR 72221-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

use it like you want.
My contribution of check #1189 in the amount of \$ 100.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

John S. Denney, Jr.
Signature

Occupation

9/21/92
Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6057

Scherrey P. Cardwell
4907 Williams
Lawton, OK 73505-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5070 in the amount of \$ 20.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Scherrey Cardwell
Signature
COLLEGE PROFESSOR
Occupation

September 25, 1992
Date
CAMERON UNIVERSITY
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6053

Frederick L. Strausbaugh
RD 1 Box 1121
Spring Grove, PA 17362-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #195 in the amount of \$ 10.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Frederick L. Strausbaugh
Signature

9-25-92
Date

OFFICE WORKER
Occupation

GUS FARM EQUIPMENT
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Mary E. Mulone
70 Westview Mnr.
York, PA 17404-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #175 in the amount of \$ 50.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Mrs. Mary E. Mulone
Signature

September 25, 1992
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Frances D. Hulett
2609 N.W. 46th St.
Oklahoma City, OK 73112-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1357 in the amount of \$ 25.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Frances D. Hulett
Signature

25 Sept 1992
Date

Retired
Occupation

Employer

6059

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Morgaine Ni Dana
6609 Brann
Oakland, CA 94605-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2064 in the amount of \$ 25.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Morgaine Ni Dana
Signature
Massage Therapist
Occupation

September 25, 1992
Date
self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Craig Griffin
1074 Spruce St.
Berkeley, CA 94707-2628

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1318 in the amount of \$ 20.26, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Craig Griffin
Signature
Homemaker
Occupation

7/24/92
Date
—
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Donald B. Moore
185 Knight Road
Gettysburg, PA

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #669 in the amount of \$ 50.00, deposited on 09/01/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Donald B. Moore
Signature
Retired
Occupation

9-24-92
Date
6060
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Bernard H. Petrina
P. O. Box 6309
Harrisburg, PA 17112-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #876 in the amount of \$ 25.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Bernard H. Petrina
Signature

Sept 23/92
Date

Management Advisor
Occupation

Self Employed
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

David Scott Molloy
550 Usquepaugh Rd
West Kingston, RI 02892-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2202 in the amount of \$ 25.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

David Scott Molloy Jr
Signature

9-25-92
Date

Professor
Occupation

University of Rhode Island
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Arlene M. Pershing
15098 Andover St.
San Leandro, CA 94579-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1758 in the amount of \$ 25.00, deposited on 09/01/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Arlene M. Pershing
Signature

9-24-92
Date

Retired
Occupation

Uncle Sam
Employer

6061

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Ann C. Stickle
2308 Wilson Blvd.
Winchester, VA 22601-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3433 in the amount of \$ 20.00, deposited on 09/08/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ann C. Stickle
Signature

Sept 24 - 1992
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Kathryn M. Cliff
221 N. Royal Street
Alexandria, VA 22314-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1382 in the amount of \$ 100.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Kathryn M. Cliff
Signature

September 25, 1992
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

James H. Shelton
4141 N. Henderson Rd., No. 919
Arlington, VA 22203-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #462 in the amount of \$ 100.00, deposited on 09/03/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

James H. Shelton
Signature

9 / 24 / 92
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6062

Osa Nurmi
1511 Rucker Ave
Everett, WA 98201-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4922 in the amount of \$ 35.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Osa Nurmi
Signature
Retired
Occupation

9/24/92
Date
N/A
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Christal A. Peterson
516 Lake Shore Drive
Escanaba, MI 49829-

Christal A. Peterson

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #9630 in the amount of \$ 50.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Christal Peterson
Signature
Retired
Occupation

0 30 00
Date
None
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Joyce L. Padmore
1430 S. Main St.
Harrisonburg, VA 22801-

GOOD LUCK!

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2606 in the amount of \$ 10.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Joyce L. Padmore
Signature
Homemaker
Occupation

9-23-92
Date
my job was lost
Employer
when the business failed

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

I Am enclosing an ~~extra~~ additional
ten dollar check to the Legal Fund. Thanks, George

Marilyn Dubasak
9454 Usher Road
Olmsted Township, OH 44138-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #564 in the amount of \$ 100.00, deposited on 09/01/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Marilyn Dubasak
Signature
professor
Occupation

9/24/92
Date
UCC
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Windsor D. Campbell
1626 Shelter St., N.W.
Palm Bay, FL 32907-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #437 in the amount of \$ 50.00, deposited on 09/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Windsor D. Campbell
Signature
Accountant (Retired)
Occupation

SEPTEMBER 25, 1992
Date
NEW YORK CITY CIVIL SERVICE COMMISSION
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Stewart Jaffe
2840 Wyndham Lane
Orlando, FL 32808-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #9222 in the amount of \$ 25.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Stewart Jaffe
Signature
Pharmacist
Occupation

9/24/92
Date
6064
Edel Drug Inc
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Richard A. Gridley
3079 Polly Rd.
Ravenna, OH 44266-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5876 in the amount of \$ 25.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Richard A. Gridley
Signature
DISPATCHER
Occupation

9-25-92
Date
7UP CLEVELAND OHIO
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Delene D. Perley
2629 Armstrong Drive
Wooster, OH 44691-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #107 in the amount of \$ 20.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Delene Perley
Signature
asst. professor
Occupation

9/24/92
Date
Walden College
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6065

Judith Gross
2248 Cordova Avenue
Youngstown, OH 44504-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #656 in the amount of \$ 18.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Judith Gross
Signature
Secretary at Day Care
Occupation
and Center
(retired school teacher)

September 25, 1992
Date
Tim's Tots, Struthers Ohio
Employer
4447

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

My cousin received a Clinton/Gore button to

*sent, also, check in
the amount
of \$7.16 to
equal m.l.
pledge
\$25.*

Thelma R. Cantrell
Rt. 1, Box 378
Strafford, MO 65757-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4530 in the amount of \$ 50.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Thelma Cantrell
Signature

Sept 26 - 92
Date

Home maker
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

L.V Withee
748 Elling Dr
Manhattan, KS 66502-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2995 in the amount of \$ 50.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

L.V. Withee
Signature

Sept 24, 1992
Date

Aggravatorist
Occupation

K.S. Retired
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

H Stewart Parker
1938 11th Ave. E
Seattle, WA 98102-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1021 in the amount of \$1000.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

HSP
Signature

9-25-92
Date

Pres. & CEO
Occupation

Targeted Genetics Corp. 6066
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Donald E. Sharp
66 Avon Rd
Bronxville, NY 10708-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #0938 in the amount of \$1000.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Donald E. Sharp
Signature
Bank Consultant
Occupation

9/24/92
Date
Community Mutual Savings Bank
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Antoinette M. Gustafson
237 W. 14th St., C3
New York, NY 10011-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #457 in the amount of \$ 25.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Antoinette M. Gustafson
Signature
Materials Mgr.
Occupation

9/24/92
Date
Marnella Dir GBJS
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Ronald J. Grunewald
321 W. 16th, #2W
New York, NY 10011-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #92435 in the amount of \$ 50.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ronald J. Grunewald
Signature
WORK COORDINATOR
Occupation
LOGISTICIAN

9/24/92
Date
6067
DIGITAL EQUIP CORP.
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Evelyn Shinn
614 Gladstone LN.
Holmes Beach, FL 34217-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1009 in the amount of \$ 100.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Evelyn Shinn
Signature

9/25/92
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

I am enclosing another \$100.00 to be contributed to the General Election Legal Accounting Compliance Fund. Best Wishes

Max Odlen
535 Sanctuary Dr. #A203
Longboat Key, FL 34228-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #514 in the amount of \$ 25.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Max Odlen
Signature

SEPT 25 1992
Date

RETIRED
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

E.S. Grinnell
P.O. Box 9722
Bradenton, FL 34206-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1311 in the amount of \$ 50.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

E.S. Grinnell
Signature

9/25/92
Date 6068

President
Occupation

Grinnell Sales Co
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Cecelia A. Drogowski
1700 Embassy Dr. Apt 106
West Palm Beach, 33401-

*Can't -
My friends are with some
one I have great respect for*

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #233 in the amount of \$ 100.00, deposited on 09/03/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Still keep my RD active -
Cecelia A. Drogowski
Signature

Sept. 25. 1992
Date

Nurse wife age 51 -
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

over -

Dorcas D. Davis
900 Calle De Los Amigos #B506
Santa Barbara., CA 93105-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2813 in the amount of \$1000.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Dorcas D. Davis
Signature

Sept. 25 1992
Date

Teacher
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Charles H. S. Chapman
15 West 11th St.
New York, NY 10011-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1505 in the amount of \$ 500.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Charles H. S. Chapman
Signature

9/25/92
Date

Financial services
Occupation

Self
Employer

6069

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Herman Metoyer
P.O. Box 7073
N.O., LA 70186-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #mo in the amount of \$ 15.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Herman Metoyer 9-25-92
Signature Date
Public Relations Consultant Self
Occupation Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

G.V. Horton
5603 S. Rockford
Tulsa,, OK 74105-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #785 in the amount of \$ 250.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

G.V. Horton 9-25-92
Signature Date
Consultant - Retired Civil Servant Self Employed
Occupation Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

J.E. Heaberlin
99 Windsor Rd.
Springfield, IL 62702-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3335 in the amount of \$ 25.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

J.E. Heaberlin 9/25/92
Signature Date
RETIRED 6070
Occupation Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Susan Sondergaard
R.D. 7, Box 7579
Stroudsburg, PA 18360-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3632 in the amount of \$ 200.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Susan Sondergaard
Signature

9/26/92
Date

Housewife
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Margaret D. Cossum
568 Ingleside Park
Evanston, IL 60201-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4164 in the amount of \$ 250.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Margaret D. Cossum
Signature

September 15, 1992
Date

housewife
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Patricia J. Curnow
184 Montieth Ct.
Vernon Hills, IL 60061-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1434 in the amount of \$ 50.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Patricia J. Curnow
Signature

Sept 24, 1992 6071
Date

Physical Therapist Assistant
Occupation

Jeff Breneman P.T.
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Emory T. Carl
833 Jaquet
Bellaire, TX 77401-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #347 in the amount of \$ 250.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Use it however you like - without restriction - to further the campaign. ETC

Emory T. Carl
Signature

9/25/92
Date

Retired
Occupation

Self-employed prior to retirement
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

William Grisham
5010 N. Tamarack Dr.
Barrington, IL 60010-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1467 in the amount of \$ 200.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

William D. Grisham
Signature

9-25-92
Date

Region Sales Manager
Occupation

Scott's Liquid Gold, Inc
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

I AM Bill Clinton's Cousin, PLEASE wish him the best.

E. W. Ward
Cypress Valley Ranch Rt 1 Box 9
Springfield, AR 72157-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4853 in the amount of \$ 300.00, deposited on 09/03/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

E. W. Ward
Signature

Sept. 25, 1992
Date

Farmer
Occupation

Self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6072

Gerald Grove
R.R. 6
Decatur, IN 46733-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #414 in the amount of \$ 50.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Gerald Grove
Signature

9-25-92
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Niels O. Jorgensen
23515 Elmwood Ct.
Spring, TX 77389-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #7389 in the amount of \$ 100.00, deposited on 09/03/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Niels O. Jorgensen
Signature

9/25/92
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Richard Fidler
3224 Timmons Lane #103
Houston, TX 77027-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1796 in the amount of \$ 20.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Richard Fidler
Signature

SEPT. 25, 1992
Date

PHOTOGRAPHY
Occupation

RE-TIRED
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6073

Jerome F. O'Neill
47 Crescent Terrace
Burlington, VT 05401-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3076 in the amount of \$1000.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

J F O'Neill
Signature
Lawyer
Occupation

9/24/92
Date
O'Neill and Crawford, P.C.
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Judith Palmer
14 E. Lodges Lane
Bala Cynwyd, PA 19004-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5498 in the amount of \$ 30.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Judith Palmer
Signature
plant technician
Occupation

9/25/92
Date
self-employed
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Christine J. Farrelly
247 Beechwood Drive
Rosemont,, PA 19010-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1277 in the amount of \$ 50.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Christine Farrelly
Signature
Secretary
Occupation

9/25/92
Date
Farrelly Bros. 6074
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Irving Joffe
1013 Robwill Pass
Cherry Hill, NJ 08034-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1910 in the amount of \$ 25.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Irving Joffe
Signature
Retired Eng. Mgr.
Occupation

September 25, 1992
Date
NA
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Jonathan Czar
R. R. 1
Poultney, VT 05764-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5327 in the amount of \$ 10.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Jonathan Czar
Signature
RETIRED TEACHER
Occupation

Sept. 24, 1992
Date
GREEN MOUNTAIN COLLEGE
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

B.H. Veehoff
1515 North Lake Ave
Storm Lake, IA 50588-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #327 in the amount of \$ 100.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

You may use my check in any way you want to, to best help
get Clinton & Gore elected.
Signature
B.H. Veehoff 9/26/92
Date

Occupation

Employer

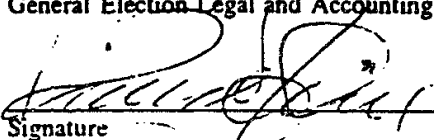
6075

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Vincent R. Defelice
3260 Newgate Ct.
Dublin, OH 43017-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1419 in the amount of \$ 25.00, deposited on 08/21/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.


Signature

9/24/92
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6076

Austin B. Comstock
P.O. Box 1285
Santa Cruz, CA 95060-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #3659 in the amount of \$ 50.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Austin B Comstock
Signature

9-24-92
Date

Lawyer
Occupation

Self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Her's another \$50 - 90 get 'em

Jan C. Tepper
193 Helen Ct.
Santa Cruz, CA 95065-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4871 in the amount of \$ 100.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Jan C Tepper
Signature
Chief of Police
Occupation

9/24/92
Date
UNIVERSITY OF CALIFORNIA, SANTA CRUZ
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Juanita Lang
526 Magoffin
St. Louis,, MO 63129-3743

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #386 in the amount of \$ 10.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Juanita Lang
Signature
Retired husband
Occupation

September 25-1992
Date
House-Wife
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6077

→

104 N. Walnut St.
Rolla, MO 65401-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2707 in the amount of \$ 50.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Hortensia Lato
Signature

9/25/92
Date

Retired
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Ray Decker
W1598 Center St.
Chilton, WI 53014-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #190 in the amount of \$ 20.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ray Decker
Signature

9/24/92
Date

Self Consultant
Occupation

Self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Albert L. Dudley
1420 Three Mile Drive
Grosse Pointe Park, MI 48230-1126

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4947 in the amount of \$ 10.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Albert L. Dudley
Signature

Sept 24, 1992
Date

Retired
Occupation

Retired.
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6073

Linville L. Doan
976 Portland Ave.
St. Paul, MN 55104-7034

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5251 in the amount of \$ 50.00, deposited on 09/01/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Occupation

Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Fred L. Davis
2100 E. Cliff Road #104A
Burnsville, MN 55337-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1609 in the amount of \$ 20.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Occupation

Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Arlene J. Neumann
5320 Blake Rd. S.
Edina, MN 55436-1163

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #10927 in the amount of \$ 25.00, deposited on 09/08/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Signature

Occupation

Date

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6073

504 S. Washington W.
Mexico, MO 65265-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2071 in the amount of \$ 30.00, deposited on 08/26/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Mark Farnum
Signature

September 25, 1992
Date

DIRECTOR OF ECONOMIC DEVELOPMENT
Occupation

CITY OF MEXICO, MISSOURI
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Mark Farnum

01. Kay Parham
3104 Cross Valley Road
Knoxville, TN 37917-

X

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1890 in the amount of \$ 10.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Olga Kay Parham
Signature

Sept. 23, 1992
Date

Librarian
Occupation

Knox County Public Library
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Eliot Specht
10639 Rivermost Lane
Knoxville, TN 37922-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1313 in the amount of \$ 100.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Eliot Specht
Signature

9/24/92 6080
Date

Physicist
Occupation

Martin Marietta Energy Systems
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Judith Peck
P. O. Box 5
Sterling Forest, NY 10979-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #109 in the amount of \$ 50.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Judith Peck
Signature
College Professor
Occupation

9/23/92
Date
Ramapo College of New Jersey
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Vivian Cooper
7957 Sangamon Ave.
Sun Valley, CA 91352-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #671 in the amount of \$ 25.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Vivian Cooper
Signature
TYPIST CLERK
Occupation

9-24-92
Date
UNEMPLOYED
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Kennon H. Shank
1100 Jamie Lane
Bloomington, IN 47401-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1609 in the amount of \$ 50.00, deposited on 08/25/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Kennon H. Shank
Signature
Retired
Occupation

9/24/92
Date
6081
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Kennon H. Shank Bloomington, IN
1100 Jamie Lane 47401

Mike Felber
120 W. 3rd St., #300
Fort Worth, TX 76102-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #535 in the amount of \$ 500.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Mike Felber
Signature

9/25/92
Date

LAWYER
Occupation

SELF
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Geoffrey E. Clark
152 Middle St.
Portsmouth,, NH 03801-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2047 in the amount of \$ 500.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Geoffrey E. Clark
Signature

9/25/92
Date

Representative
Occupation

Carroll County, PA
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Martha Fuller Clark
152 Middle Street
Portsmouth,, NH 03801-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #2049 in the amount of \$ 500.00, deposited on 08/27/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Martha Fuller Clark
Signature

9/25/92
Date

State Representative
Occupation

State of NH
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Joan D. Hodges
3825 Caruth Blvd
Dallas, TX 75225-5216

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #9713 in the amount of \$ 50.00, deposited on 09/04/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Joan D. Hodges
Signature
School administrator
Occupation

9/25/92
Date
M. Philip's School Community Center
Employer
1600 Pennsylvania Avenue
Dallas, Texas 75215

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Norris L. Parker
810B West 10th St.
Austin, TX 78701-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #4231 in the amount of \$ 25.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Norris L. Parker
Signature
Accounts Executive
Occupation

9-25-92
Date
Texas Employment Commission
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Murry Morgenstern
91 Squire Hill Rd.
New Milford, CT 06776-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #573 in the amount of \$ 50.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Murry Morgenstern
Signature
Psychologist
Occupation

9/26/92
Date
self
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Phyllis J. Devenny
524 Sleepy Hollow Rd.
Pittsburgh, PA 15228-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #8015 in the amount of \$ 25.00, deposited on 09/08/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Phyllis J. Devenny
Signature
Retired
Occupation

9/24/92
Date
Retired
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Margaret A. Hogan
4740 Mercier Street
Kansas City, MO 64112-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #7173 in the amount of \$ 100.00, deposited on 09/02/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Margaret A. Hogan
Signature
Retired Teacher
Occupation

September 24, 1992
Date
Shawnee Mission Public Schools (in Kansas)
Ex-Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Stella J. Currin
1401 Enderly Rd.
Charlotte, NC 28208-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #1788 in the amount of \$ 100.00, deposited on 08/31/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Stella J. Currin
Signature
re-tired
Occupation

9-24-92
Date
6084
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Grady Parsons
100 Leafmore Lane
Bristol, TN 37620-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5635 in the amount of \$ 50.00, deposited on 08/24/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Grady Parsons
Signature

9/23/92
Date

minister
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Ethel R. Perry
822 Florida St.
Milton, WV 25541-1304

*and you + your dear wife push Old Bush
out off the white house
I love you all God Bless E.R.P*

☒ YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #434 in the amount of \$ 25.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Ethel R. Perry
Signature

Sept 26, 1992
Date

Home wife & widow
Occupation

Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

Frances R. Shipley
405 Evanswood Pl
Cincinnati, OH 45220-

YES, I want to redesignate my contribution to the General Election Legal and Accounting Compliance Fund.

My contribution of check #5441 in the amount of \$ 10.00, deposited on 08/28/92, should be redesignated to the General Election Legal and Accounting Compliance Fund. My signature appears below.

Frances R. Shipley
Signature

September 24, 1992
Date

Retired
Occupation

Procter & Gamble Co.
Employer

I understand that if I choose not to redesignate my contribution, I may request a refund of this amount.

6085